# **TSD File Inventory Index**

Date: 10 4 2001
Initial: 10 4 1000

Facility Name: Facility Identification Number: A.1 General Correspondence B.2 Permit Docket (B.1.2) A.1.1-A-1.2-A.1.3 A.2 Part A / Interim Status .1 Correspondence .1 Correspondence .2 All Other Permitting Documents (Not Part of the ARA) .2 Notification and Acknowledgment C.1 Compliance - (Inspection Reports) C.2 Compliance/Enforcement .3 Part A Application and Amendments .1 Land Disposal Restriction Notifications .4 Financial Insurance (Sudden, Non Sudden) .5 Change Under Interim Status Requests .2 Import/Export Notifications .6 Annual and Biennial Reports C.3 FOIA Exemptions - Non-Releasable Documents A.3 Groundwater Monitoring D.1 Corrective Action/Facility Assessment .1 Correspondence .1 RFA Correspondence .2 Reports .2 Background Reports, Supporting Docs and Studies A.4 Closure/Post Closure .3 State Prelim. Investigation Memos .1 Correspondence .4 RFA Reports A. 4.1-A.4.2-A.4.3 1.1.4 .2 Closure/Post Closure Plans, Certificates, etc. D. 2 Corrective Action/Facility Investigation A.5 Ambient Air Monitoring .1 RFI Correspondence .1 Correspondence .2 RFI Workplan .2 Reports .3 RFI Program Reports and Oversight B.1 Administrative Record

Total -5

.4 RFI Draft /Final Report

.5 RFI QAPP	.7 Lab data, Soil Sampling/Groundwater
.6 RFI QAPP Correspondence	.8 Progress Reports
.7 Lab Data, Soli-Sampling/Groundwater	D.5 Corrective Action/Enforcement
.8 RFI Progress Reports	.1 Administrative Record 3008(h) Order
.9 Interim Measures Correspondence	.2 Other Non-AR Documents
.10 Interim Measures Workplan and Reports	D.6 Environmental Indicator Determinations
D.3 Corrective Action/Remediation Study	.1 Forma/Checkists
.1 CMS Correspondence	E. Boilers and Industrial Furnaces (BIF)
.2 Interim Measures	.1 Correspondence
.3 CMS Workplan	.2 Reports
.4 CMS Draft/Final Report	F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)
5. Stabilization	G.1 Rick Assessment
.6 CMS Progress Reports	.1 Human/Ecological Assessment
.7 Lab Data, Soil-Sampling/Groundwater	.2 Compliance and Enforcement
D.4 Corrective Action Remediation Implementation	.3 Enforcement Confidential
.1 CMI Correspondence	.4 Ecological - Administrative Record
.2 CMI Workplan	.5 Permitting
.3 CMI Program Reports and Oversight	.6 Corrective Action Remediation Study
.4 CMI Dreft/Final Reports	.7 Corrective Action/Remediation Implementation
.5 CMI QAPP	.8 Endangered Species Act
.6 CMI Correspondence	.9 Environmental Justice

Note: Transmittal Letter to Be included with Reports.	 r .	· =		٠	
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17 Copies 1 to Each File

JOHN ENGLER, Governor

# DEPARTMENT OF ENVIRONMENTAL QUALITY

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

RUSSELL J. HARDING, Director

August 5, 1996

WASTE MANAGEMENT DIVISION PO BOX 30241

Mr. Paul Little Enforcement Program Section - HRE-8J Region 5 U.S. Environmental Protection Agency 77 West Jackson Boulevard Chicago, Illinois 60604-3590

Dear Mr. Little:

In response to a recent request from your office for information on several Michigan hazardous waste facilities, I offer the following:

None of the identified facilities have any Resource Conservation and Recovery Act (RCRA) enforcement action recently taken or about to be initiated. Any inspection to be completed at these facilities would be a result of them not being inspected previously or part of our Treatment, Storage, and Disposal Facility (TSDF) commitments. We have not identified any specific issues which would cause us to consider these facilities for special inspections. Specific comments on the facilities:

- 1. BASF - MID064197742 - 1609 Biddle Avenue, Wyandotte is a TSDF which has a very old Order 4 in place (not a Waste Management Division Order) directing cleanup activities. This is part of an Environmental Response Division (ERD) Remedial Action Plan on which ERD has the lead.
- 2. BASF - MID001868538 - 5935 Milford Avenue, Detroit is a TSDF proceeding with closure of their RCRA unit.
- 3. BASF - MID007138746 - 3301 Bourke Avenue, Detroit is a TSDF which has been clean closed and is awaiting corrective action.
- BASF MID057007478 1200 Blaney Drive, Troy is a TSDF which has been clean closed and is awaiting corrective action.
- 5. BASF - Holland - BASF formerly owned two facilities in Holland. One facility was a research and development laboratory at 491 Columbia Avenue. The other facility, at 492 Douglas Avenue, was a full production plant. Both plants were involved in the development and manufacture of pigments, both in powder and in flushed forms. Effective July 1, 1996, BASF sold both of its Holland plants to Flint Ink Corporation. Approximately 50 percent of the former BASF employees were terminated as a result of the sale. Prior to the sale, there have been no state RCRA enforcement actions against either of these plants. We have no plans for an immediate inspection at the Douglas Avenue facility, although one will be conducted at some point in the future since it retains a generator status.

- 6. BASF 836 Chicago Drive, Grand Rapids This facility has not been involved in a RCRA enforcement action and no enforcement actions are planned. The last routine inspection was conducted on May 3, 1996, which was followed by a letter of warning. The company has indicated that most of the violations have been corrected and they are actively working toward correcting the rest. Once BASF indicates that all of the violations have been corrected, a follow-up inspection will be conducted.
- 7. Reichhold Chemicals Inc., Ferndale MID020087128 This facility is a TSDF which is subject to corrective action. They are in the process of remediation. The facility is closed with the buildings demolished.

We have no record of inspections for the following facilities:

- 1. BASF Widger Chemical, Warren
- BASF Wyandotte Terminal, Wyandotte
- 3. ARMCO, Inc., Plymouth
- 4. ARMCO, Inc. Taylor
- 5. Automotive Refinish or BASF, 19855 Outer Drive, Dearborn
- BASF, 2855 Coolidge, Troy
- BASF, 1419 Biddle Street, Wyandotte
- 8. BASF, 1725 Biddle Street
- 9. Reichhold Chemicals, 4134 Yorba Linda Boulevard, Royal Oak

For the facilities we have either not inspected or have not conducted recent inspections, there may be some incentive to consider as part of an initiative. Overall, our thought would be that the national initiative would not be that beneficial to the RCRA program for BASF Corporation based upon our contacts with the facilities through our inspections.

Please let me know if I can be of further assistance on this matter.

Sincerely,

Frank Ruswick, Jr. Program Manager

Waste Management Division

Frank Rusurck (ekp)

517-373-6093

K.C. Koneval, Special Projects Manager BASF Corporation 8 Campus Drive Parsippany, New Jersey 07054

0.2.1

Re: BASF - Troy, Michigan EPA ID No.: MID 057 007 478

Dear Mr/Ms. Koneval:

This letter is in response to your letter of July 20, 1992, in which you requested that the United States Environmental Protection Agency (U.S. EPA) provide BASF Corporation with the conclusion and recommendation portions of the Preliminary Assessment/Visual Site Inspection (PA/VSI) Report. You further requested that U.S. EPA review and provide input on any scope of work BASF Corporation prepares before undertaking any voluntary environmental protective measures at the site.

Since the conclusion and recommendation portion of the PA/VSI Report contains information that is used in the deliberative process by U.S. EPA to rank candidates for corrective action, it has been U.S. EPA policy not to release this information. The circumstances you explained at the above-referenced facility do not warrant a waiver of U.S. EPA's confidentiality claim.

In regard to your request that U.S. EPA review scopes of work, U.S. EPA does not have the resources to participate in such activity on a voluntary basis. Enclosed for your reference, however, are copies of U.S. EPA's model Corrective Action Order (CAO) and Corrective Action Plan (CAP). The CAO can be issued by U.S. EPA pursuant to Section 3008(h) of the Resource Conservation and Recovery Act (RCRA), as amended. If BASF Corporation were to enter into a consent agreement with U.S. EPA to conduct a full RCRA Facility Investigation and Corrective Measure Study (RFI/CMS), U.S. EPA could then actively participate in the process. The CAP is a model scope of work which identifies the tasks necessary to conduct the RFI/CMS.

If you have any questions regarding this matter, please contact Laura Lodisio, Chief of the Michigan/Wisconsin Technical Enforcement Section of the RCRA Enforcement Branch. She can be reached at (312) 886-7090.

Sincerely yours,

ORIGINAL SIGNED BY WILLIAM E. MUNO

William E. Muno, Acting Director Waste Management Division

Enclosure

cc: D. Drake, Michigan DNR

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July 20, 1992

Mr. William E. Muno, Director
Waste Management Division, H - 7J
United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, IL 60604

RE: BASF - Troy, Michigan MID 057 007 478

Dear Mr. Muno:

BASF Corporation (BASF) is in receipt of your letter of June 11, 1992 transmitting a copy of the Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. BASF is considering divesting this property and was waiting for guidance from this report to identify any potential environmental protective measures to be voluntarily taken prior to offering the property for sale.

The report did not identify any areas of concern (AOC) and only two solid waste management units (SWMU) were identified. SWMU #1 is an area formerly used for satellite accumulation of waste and SWMU #2 is the closed waste storage area(documented clean closure). Based on the PA/VSI report there is no indication that either of these areas presents any environmental problem.

BASF plans to conduct its own environmental assessment of the property. However, without the specific guidance that the conclusion and recommendation portions of the report may contain, BASF cannot be assured that any remedial work that it may undertake will adequately address EPA's concerns. Therefore, BASF requests that EPA waive its enforcement confidential claim over the conclusion and recommendation. Regardless of EPA's decision on the waiver request, we hope that we may call upon the Agency to review any proposed scope of work and to obtain your input prior to conducting any work.

PAGE TWO
BASF - Troy, Michigan
July 20, 1992

We will contact you as soon as we have prepared the scope of work ready for review. In the meantime, should you have questions on this approach or if you would be willing to provide the missing portions of the report, please contact the undersigned.

Very truly yours,

K. C. Koneval

10 Konwal

Manager

Special Projects

/tn

cc: K. Pierard, EPA

S. Bianchin, EPA

B. Okwumabua, Michigan DNR

D. Drake, Michigan DNR

K. Burda, Michigan DNR



Douglas Martin, Attorney BASF 100 Cherry Hill Road Parsippany, New Jersey 07054

Re: BASF - Troy

MID 057 007 478

Dear Mr. Martin:

Enclosed please find a copy of the Preliminary Assessment/Visual Site Inspection for the referenced facility.

The executive summary and conclusions and recommendations section have been withheld as enforcement confidential.

If you have any questions, please contact me at (312) 886-4448.

Sincerely yours,

Kevin M. Pierard, Chief Minnesota/Ohio Technical Enforcement Section RCRA Enforcement Branch

Enclosure

cc: Ken Connival
BASF Corporation
8 Campus Drive

Parsippany, New Jersey 07054

HRE-8J:FHARRIS:6-2884:6/10/92:MASTER

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MICHIGAN DEPARTMENT OF NATURAL RESOURCES

### INTEROFFICE COMMUNICATION

Feb. 8

To:

Ronda Hall, Engineer, HW Permits Unit

From:

Liz Browne, Environmental Monitoring Coordinator

Subject: BASE Corporation, Chemicals Division

MID 057 007 478

I have reviewed the material submitted by Clayton Environmental Consultants, Inc. relating to the drum storage pad closure at BASF s Troy, Michigan facility. This included the initial closure certification dated December 22, 1988. There were two outstanding concerns that you identified in a January 19, 1989 letter to Mr. William Robert that related to test methods and limits of detection. The second submittal, dated January 30, 1989, attempted to address these concerns.

The lab indicated that they used GC/MS procedures to quantify the levels of toluene diamine (TDA). These procedures were supplied by BASF staff and are in the closure plan. GC/MS is a very comprehensive analysis, capable of determining a variety of organic chemicals at the levels identified in the submittal (10 ppm). Kim Paksi, Land Application Unit's Lab Scientist may be of more help in determining the appropriateness of this analytical method.

Clayton submitted results for methylene chloride in soil with two very different limits of detection (LOD), based on the use of analytical methods contained in the 2nd and 3rd Edition of SW-846. Since they have supplied analytical data to a detection limit of 6 ug/kg in soil, the limit of 600 ug/kg for the 2nd Edition data is not of major concern. Wong has gone in to fairly good detail in explaining the different extraction methods used. It is the extraction method that is responsible for the variability in the resultant limits of detection.

As Dr. Wong states, the limit of detection for a quality control blank sample is expected to be lower than that of a soil sample, however, the explanation given is not clear as to the cause of this difference. It states that the soil samples contain moisture, and the data is reported on a dry weight basis (as appropriate). It goes on to state that the blank sample does not contain moisture. I am not sure what type of blank is used for this determination. It is assumed that the sample is obtained from an empty vial, and injected directly into the GC. As the reported data indicates that the Q. C. blank did not contain any methylene chloride or TDA at levels at or above the sample LOD, this concern has been addressed, regardless of the type of blank used.

The analytical concerns that you identified in your letter have been addressed. The different LOD's identified have been explained. The only outstanding item is the use of GC/MS for TDA analysis. Kim Paksi may have more detailed information on this protocol, or may be able to determine the applicability of it to this situation based on the data in the original closure plan.

If you have any questions on this review, please let me know and I will attempt to address them at that time.

cc: Ms. D. Montgomery /

# RCRA/ACT 64 INSPECTION REPORT

U:S. EPA I.D. NUMBER M I D O 5 7 O O 7 4 7 8 (or Michigan)

(Mailing Address)	BAST-Wyandotte	
8	1200 BLANEY DR.	
	TROX MICHIG	1808L NA:
	CITY	ZIP CODE
DATE August 17, 198	TIME OF INSPECTION	(FROM) \\(\frac{10}{30}\)(TO)
PERSON(S) INTERVIEWE	ED TITLE	TELEPHONE
Bill Robert		591-5588
		MODE PARALES
INSPECTOR(S)	AGENCY/TITLE	TELEPHONE
Lynne King	MASTER WASTER	WEEMENT 344-4670
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STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION
MAS J. ANDERSON
HENE J. FLUHARTY
DIEPHEN V. MONSMA
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JAMES J. BLANCHARD, Governor

### DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

April 18, 1986

Mr. Dale Roush BASF Corporation, Chemical's Division 1609 Biddle Avenue Wyandotte, MI 48192

RE: MID 057007478 - Troy Facility

Dear Mr. Roush:

This letter is to acknowledge receipt of your letter dated April 7, 1986 indicating your compliance program for RCRA deficiencies cited during my inspection on November 26, 1985. Your response is acceptable at this time and the adequacy of your program will be evaluated during future inspections. I again stress the importance of proper manifesting between Troy and Wyandotte. I am assuming you have made all necessary corrections to update the Troy facility's records to verify receipt of all their wastes at Wyandotte as the transfer facility and receipt of final disposal.

If you have any questions, feel free to contact me at (313) 459-9180.

Sincerely

Lynne King

Hazardous Waste Division

LK/aw

cc: Ben Okwumabua

EPA - Region V

NATURAL RESOURCES COMMISSION

"OMAS J. ANDERSON
RLENE J. FLUHARTY
EPHEN V. MONSMA
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY



S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

JAMES J. BLANCHARD, Governor

### **DEPARTMENT OF NATURAL RESOURCES**

RONALD O. SKOOG, Director

March 7, 1986

Mr. Dale Roush BASF Corporation, Chemical's Division 1609 Biddle Avenue Wyandotte, MI 48192

RE: MID 057007478 - Troy Facility

Dear Mr. Roush:

This letter is to acknowledge receipt of your letter dated February 5, 1986, indicating your compliance program for RCRA deficiencies cited during my inspection on November 26,1985. As we have been doing in the past, I will respond to each item in the same order we have been using.

- Item 5. The operating log has been submitted and reviewed. 40 CFR §265.73 also states the log must also note the location and quantity of each hazardous waste located within the facility with a cross reference to a specific manifest showing disposal.
- Item 6. It was acknowledged during our meeting on November 26, 1985, that all treatment of isocyanates was discontinued November 11, 1985.
- Item 7. It is noted that the company filed an amended notification form with the EPA to include all regulated waste types generated.
- Item 8. Two manifests of hazardous wastes are noted for the period 3/14/85 1/2/86. One shipment of F002 has no manifest number available. Was there a manifest for this shipment off-site? The other load (12/18/85) was shipped to BASF-Wyandotte as 029L but is noted as being hazardous Methylene Diisocyanates and toluene Diisocyanates. An improper waste code was used. I must stress the importance of manifesting each load from BASF-Troy and using the proper waste codes.
- Item 9. The manifest for the shipment of the 16 carboys of isocyanates was provided as requested but again I refer you to the comment above on the the 12/18/85 shipment.
- Item 10. The manifest for the shipment of Troy wastes from BASF-Wyandotte was provided as requested. Again I must note the importance of manifesting that waste from Troy to Wyandotte or to Rollins if is was not off loaded at Wyandotte.

Mr. Dale Roush March 7, 1986 Page 2

You are requested to respond by March 14, 1986, to the comments and questions noted on the operating log and manifesting documenting further action to establish and maintain compliance with RCRA requirements. If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely,

Lynne King

HAZARDOUS WASTE DIVISION

LK:jg

cc: U.S. EPA, Region V

B. Okwumabua



February 5, 1986

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CERTIFIED NO. P 447 526 739

FEB 0 6 1986

Ms. Lynne King Hazardous Waste Division Department of Natural Resources 15500 Sheldon Road Northville, MI 48167 'AZARDOUS WASTE DIV

Dear Ms. King:

Re: BASF Corporation Chemicals Division - Troy Facility - MID 057007478

The intent of this letter is to respond to the outstanding RCRA related issues addressed in your January 14, 1986 correspondence.

### Items 1-4

Each of these concerns has been adequately explained to your satisfaction per your letter.

## Item 5

A copy of the Troy facility's Operating Log is presented in the attached Exhibit I.

# Item 6

Treatment of waste isocyanate at the Troy facility was discontinued over a year ago and is not anticipated in the future.

### Item 7

You may have misread the Part A section which describes the Troy facility's waste streams. The only reference to a K054 waste is on the example for completing item V, page 2 of 5. To fully clarify the matter concerning using the proper waste code for isocyanate containing mixtures BASF will submit an amended RCRA Part A Permit Application.

### Item 8

The enclosed Exhibit I provides the information requested.

### Item 9

These waste isocyanate mixtures were transported to the Wyandotte storage facility (MID 064197742) under Michigan Manifest No. 0505199 which is enclosed as Exhibit II. This material was repackaged at Wyandotte into smaller containers and transported to Rollins Environmental Services in Baton Rouge under Louisiana Manifest, Exhibit III.

February 5, 1986

# Item 10

The waste resins referred to were included in a bulk shipment to Rollins Environmental Services at Bridgeport, NJ for incineration on December 12, 1985. Enclosed is a copy of the New Jersey Manifest NJA 0142271 (Exhibit IV) which accompanied this shipment.

If you have further questions regarding this matter, please do not hesitate to contact me at (313) 246-6106.

Yours very truly,

H. D. Roush

Manager

Quality Assurance and Environmental Affairs

mh

attachments

# TROY FACILITY - MID 057007478

# OPERATING RECORD

<u>Date</u>	Manifest No.	Waste Code	Gallons	Transporter	Designated Facility
3/14/85	MI 0505181	029L	3,520	K & D Industries	City Disposal
5/10/85	MI 0505185	029L	2,800	K & D Industries	City Disposal
7/24/85	MI 0505186	029L	3,400	K & D Industries	City Disposal
7/25/85	MI 0505187	029L	3,580	K & D Industries	City Disposal
7/30/85	MI 0505189	029L	2,500	K & D Industries	City Disposal
8/7/85	MI 0505192	029L	3,800	K & D Industries	City Disposal
10/10/85	MI 0690201	029L	2,400	K & D Industries	City Disposal
10/29/85	MI 0690203	029L	2,400	K & D Industries	City Disposal
11/22/85	Not Available	F002 *	4,770	Marine Pollution	BASF Wyandotte
12/9/85	MI 0505195	029L	4,000	K & D Industries	City Disposal
12/12/85	MI 0505196	029L	4,000	K & D Industries	City Disposal
12/20/85	MI 0690205	029L	4,000	K & D Industries	City Disposal
12/18/85	MI 0505199	029L **	1,275	Marine Pollution	BASF Wyandotte
12/26/85	MI 0690206	029L	3,500	K & D Industries	City Disposal
1/2/86	MI 0690207	029L	2,800	K & D Industries	City Disposal

<sup>\* -</sup> Hazardous F002 Waste

<sup>\*\* -</sup> Hazardous Waste - Plant waste consists of Methylene Diisocyanates and Toluene Diisocyanates. 029L - Non-hazardous chemical plant waste resins.

# DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES print or type. (Form designed for use on elite UNIFORM HAZARDOUS WASTE MANIFEST Generator's Name and Mailing Addi

"L8 must be reported to the michigan pollution emergency alerting system, in michigan at 1-800-282-4706 or out of state at 517-373-7860 and the national response at 1-800-44-8802 24 hours per day.

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EXHIBITI

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Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

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STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY • HAZARDOUS WASTE DIVISION
P.O. BOX 44307, BATON ROUGE, LOUISIANA 70804-4307

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### State of New Jersey partment of Environmental Protection **Division of Waste Management** CN 028, Trenton, NJ 08625

EXHIBIT IV

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STATE OF MICHIGAN

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S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

"" TURAL RESOURCES COMMISSION

OMAS J. ANDERSON ARLENE J. FLUHARTY STEPHEN V. MONSMA O. STEWART MYERS DAVID D. GLSON RAYMOND POUPORE BARRY H. WHITFLEY

### JAMES J. BLANCHARD, Governor

### DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG. Director

January 14, 1986

Mr. Rudi Meriweather, Plant Mgr. BASF Wyandotte 1700 Blaney Drive Troy, Michigan

Re: BASF Wyandotte Corp. - Troy Facility

MID 057007478

Dear Mr. Meriweather:

On November 26, 1985 acting as a representative of the United States Environmental Protection Agency, I performed a follow-up inspection of your facility located at 1700 Blaney Drive, Troy, Michigan to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, the following was discussed and either found in compliance or needs additional information.

- (1) The waste analysis plan was reviewed and found acceptable at this time and will be further evaluated for adequacy during future inspections.
- (2) The inspection logs were reviewed and the company reinstated regular inspections on November 11, 1985. The log must be continually maintained as per 40 CFR 265.15 and will re re-evaluated during future inspections.
- (3) Personnel Training records were reviewed and found acceptable at this time. The last training was conducted September 13, 1985. Some additional training is needed to make local staff aware of all generator requirements under RCRA to enable them to assist in staff inspections under RCRA.
- (4) The test results were reviewed and had been maintained on file.
- (5) Operating log must be maintained on wastes including tracking of storage, treatment, disposal, quantities and types, etc. in accordance with 40 CFR 265.73. This is still a delinquency.
- (6) The treatment of waste isocyanates rendering them non-hazardous by means of controlled reacting with water to produce urea was also discussed. This operation is considered treatment and subject to all applicable regulations under 40 CFR 265 Subpart J (265.190 and 265.198). Information provided has stated the company has ceased treatment of isocyanates. Should the company wish to treat this waste you must:
  - a) Amend Part A to include activity
  - b) Comply with all applicable regulations under 265
  - c) Amend inspection and operating logs and closure and financial assurance to include such activities.

- (7) Company stated there have been some process changes affecting waste generation. Use of new product may render one waste stream non-hazardous. The company is currently testing to determine status of waste. The current Part A lists K054, D002, D001 and U223. Please review waste streams to determine current status and update Part A. The indication was that the isocyanate waste is not a pure product form. Therefore, U223 would not be the proper waste code. The code for waste isocyanate which is not a pure commercial chemical product would be D003 (reactive).
- (8) The current Part A currently indicates the company is a regulated generator of hazardous waste, as well as a storage facility. A department computer summary of waste shipments from your facility indicates that no hazardous wastes have been transported off site. Please provide a listing of wastes generated by waste code and description, quantities and disposal site for wastes generated in 1985.
- (9) During the October 14, 1985 inspection, 16 carboys of waste isocyanates were being stored pending treatment. The wastes have since been removed for disposal. Please provide the manifest used for transportation and disposal of these wastes.
- (10) On December 10, 1985 department staff observed waste in storage at BASF Wyandotte at 1609 Biddle, Wyandotte. The Troy facility, as generator, maintains responsibility for their waste and its proper handling. Please provide a manifest for the transportation of that waste.

You are requested to respond to the issues addressed to this office by letter no later than January 31, 1986. If you have any questions regarding this matter, please contact me at (313) 459-9180.

Sincerely,

Lynne King

HAZARDOUS WASTE DIVISION

LK:mlm

cc: U.S. EPA, Region V

B. Okwumabua

Dale Roush (BASF Wyandotte 1609 Biddle Wyandotte, Mi 48192)

# RCRA INSPECTION REPORT

EPA Identification Number: M 1 D	05700	7 4 7 8
Installation Name: BASE W	yandette Cap.	
Location Address: 1708 8	LANEY DR.	
City: 1804	State: Matical	
Date of Inspection 11/26/85	Time of Inspection (f	rom) 1000 Am(to) 1200 Am
Person(s) Interviewed Rup, Maindeathed	Title Plant Manager	Telephone
Legnon Andrson		
Dola Rosah	Maragar Enduarin	2012-215 Dol
	-	
Inspector(s)	Agency/Title	Telephone
Lynineking	MUNR/ Chilesman Tol Cull	1, Aulyst 313.459.9180
Jan Roberts	MDDR/EN mone Jos SACOM	may 577 373.2730
Installation Activity (mark only one box	· ·	Inspection Form(s) 🔔
Treatment/Storage/Disposal per 40 ( Generation and/or Transportation	CFR §265.1 and/or	А
Treatment/Storage/Disposal (No Gene	ration or Transportatio	on) A
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JAN 1 3 1986

# CERTIFIED MAIL P611589395 RETURN RECEIPT REQUESTED

Mr. Keith Fry
Director, Corporate Environmental Protection
BASF Wyandotte Corporation
100 Cherry Hill Road
P.O. Box 181
Parsippany, N.J. 07054

RE: Corrective Action Requirements
BASF Wyandotte Corporation
Troy Works
Troy, Michigan
MID 057 007 478

Dear Mr. Fry

As you know, you have previously submitted Part A of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility. Timely submission of "the Part A" has allowed most hazardous waste management facilities to continue to operate under RCRA "interim status", while complying with applicable 40 CFR Part 265 standards.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the 1984 Amendments) were enacted to modify RCRA. Under the 1984 Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. In addition, all interim status facilities are subject to corrective action requirements, regardless of whether they have 1) submitted a Part B application, 2) submitted a closure plan, 3) reverted to generator status only, 4) actually closed, or 5) none of these. Unless our Agency has formally terminated the facility's interim status, the corrective action requirements apply. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2.

We must determine whether releases of hazardous waste or hazardous waste constituents have ever occurred at the above-referenced facility site. If they have, we must ensure that corrective actions either have been taken or will be taken to eliminate threats to public health or the environment. An important element in our decision process is the information that you provide on the enclosed certification statement. Please read it carefully and either sign it and return it, or return it unsigned with a cover letter of explanation, within 45 days of the date of this letter. At some point in time, public input will be sought to either confirm or deny information you provide, or information we gather on our own, concerning releases and corrective actions.

Sincerely yours

David A. Stringham

Chief, Solid Waste Branch

Enclosure

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NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
"RLENE J. FLUHARTY
PHEN V. MONSMA
. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY



S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

JAMES J. BLANCHARD, Governor

# **DEPARTMENT OF NATURAL RESOURCES**

RONALD O. SKOOG, Director

October 30, 1985

Mr. Rudy Meriweather, Plant Manager BASF Wyandotte 1700 Blaney Drive Troy, MI

RE: MID 057007478 RCRA Inspection

Dear Mr. Meriweather:

On October 14, 1985, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at the above address to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of Subtitle C of RCRA. Specifically, the following was found:

- 1. No waste analysis plan was available for inspection in accordance with 40 CFR §265.13.
- 2. Failure to establish and maintain and inspection log in accordance with 40 CFR §265.15.
- 3. Failure to establish and maintain personnel training records and provide annual training in accordance with 40 CFR §265.16.
- 4. Failure to establish and maintain an operating record in accordance with 40 CFR §265.73.
- 5. One manifest inspected failed to provide the required U.S. D.O.T. information in item 11 as required in 40 CFR §262.21.
- 6. Failure to maintain test results and anlysis needed for Hazardous Waste determinations retained for a minimum of three years ins accordance with 40 CFR §262.40.

You are requested to respond to this letter by November 12, 1985, providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely.

cc: U.S. EPA, Region V
B. Okwumabua
Dale Rousch

lynne Kina

# RCRA Inspection Report

EPA Identificat	ion Number: M 1	0 5 7 0 0 7	1478			
Installation Nam	me: PASE C	syandotle	2.77			
Location Address	s: Nuo Bl	aney DR.	<u>0 III                                 </u>			
City: Troy		State: MT	7			
Date of inspect	ion: 10-14-85	Time of inspection (from)	(to)			
Person(s) inter	2 PHL	Plant Manayer	Tel ephone 313-643-0883			
Copey Camp	sbell	Active: production supervi				
5 - 20		E 2 22				
Inspector(s) FAYE DEDE		Agency/Title	Telephone 459-9180			
Lynne King	<del>}</del>	ONR				
Installation Ac	tivity (mark only one	e box)	Inspection Form(s)			
Treatment/S Generation	A					
☐ Treatment/S	☐ Treatment/Storage/Disposal (no generation or Transportation)					
☐ Generation	and Transportation		В, С			
☐ Generation	only		В			
	ion only		C			

### INSPECTION FORM A

# Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit appl	catio	n process(es) (EPA Form 3510-3)	Inspection Form A	A section(s)
SOI		storage in containers		Ī
\$02	IJ	storage in tanks		J
TOI	M	treatment in tanks		J
\$04		storage in surface impoundment		K,F
Т02		treatment in surface impoundment		K,F
D83		disposal in surface impoundment		K,F
\$03	П	storage in waste pile	÷	Ļ
D81	П	disposal by land application		M,F
080		disposal in landfill		N,F
Т03	П	treatment by incineration		0/P
ТО4		treatment in devices other than t jmpoundments, or incinerators	anks, surface	Q
Other activities	<u> </u>			
GENERATOR			APPENDIX	GN
TRANSPORTER			APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

Socyanate nuclearing to use a See Section Q

T04

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

		Section B: GENERAL FACILI	<u>ry sta</u>	<u>NDARDS</u> :	(Part	265 Subpart B)
			YES	NO	NI*	Remarks
1.		the Regional Administrator notified regarding: 265.12		e t		
	<b>3.</b>	Receipt of hazardous waste from a foreign source?		·		
	b.	Facility expansion?	######################################	*Communications	description to the same of the	
	C•	Change of owner or operator?	<del></del>	<del>walling of the S</del> A		
2.	Gen	eral Waste Analysis: 265.13				•
	ð.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<b>Sing Single-Make Suppose</b>	1	eteralistimonom.	designate.
	৳•	Does the owner or operator have a detailed waste analysis plan on file at the facility?	CONTRACTOR OF THE PARTY OF THE		<del> </del>	wasta haractory
	C.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	-	MADA	#AQUA negrejopolijo	-
3.	Sec	curity - Do security measures include (if applicable) 265.14	é a			
	3.	24-Hour surveillance?	·	1	excession-addression	
	b.	or i. Artificial or natural barrier around facility? and ii. Controlled entry?	1			fine
	С.	Danger sign(s) at entrance?	Arrest Ar	<u>/</u>	manuscript (p. 4).	fine classicatings
4.	0wn	ner or operator inspections: 265.15				
	å∙	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?				

\*Not Inspected

	D.	hav	es the owner or operator we an inspection schedule the facility?	V	40-fections was disconnected and	
	C.	the	so, does the schedule address inspection of the following			
		1 .	monitoring equipment?	î.	Management Addings-mgs-propograms	
		ii.	safety and emergency equipment?	<u></u>		COMMON PROPERTY AND ADMINISTRATION OF THE PROPERTY ADMINISTRATION OF THE PROPERTY AND ADMINISTRATION OF THE PROPERTY ADMINISTRATION OF THE PROPERTY AND ADMINISTRATION OF THE PROPERTY ADMIN
		i i .	security devices?	<i>L</i>	THE PERSON NAMED IN THE PE	
		iv.	operating and structural equip- ment (i.e. dikes, pumps, etc.)?		Semantical distributions of the semantical distribution of the	
		٧.	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?			
		vi.	inspection frequency (based upon the possible deterioration rate of the equipment)?		<u> </u>	eurrently monthly mospection
	d.		areas subject to spills inspect- daily when in use?	r		·
	е.	an	s the owner or operator maintain inspection log or summary of er or operator inspections?	<del></del>		
	· f.	Doe fol	s the inspection log contain the lowing information:		1	
		i.	the date and time of the inspection?			
		ii.	the name of the inspector?		- Company - Comp	
		iii.	a notation of the observations made?	***************************************		
		iv.	the date and nature of any repairs or remedial actions?	вечененский порт		
5.	Do persor include:		training records 55.16			
	ð.	Job	titles?			
	b.	Job	descriptions?	***************************************	1	· ·

YES NO NI

Remarks

			· · ·	140	117	I/ChiQ i K 5
	c.	Description of training?			and constitution of the last o	
	ď۰	Records of training?	<del></del>		-	
	е.	Did facility personnel receive the required training by 5-19-81?			67-едествиную.	
		Do new personnel receive required training within six months?	Acrolitikoodusussa		***************************************	
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?				
ĵ.	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.17	,			•
	٥٠	Special handling?	-			
	b.	No smoking signs?				
	C.	Separation and protection from ignition sources?	41-moder-scenesses	Cynninenia		~

# Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste or hazardous waste constituent?  2. If required, does the facility have the following equipment: 265.32  a. Internal communications or alarm systems?  b. Telephone or 2-way radios at the scene of operations?  c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  3. Vesting and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  5. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?			ntenance and Operation Facility: 265.31	<b>V</b> E e	) 31.00	8! <b>°</b>	Samuel a
a. Internal communications or alarm systems?  b. Ielephone or 2-way radios at the scene of operations?  c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  3. Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency			explosion, or release of hazardous waste or hazardous	163	NO	NI	Kemark S
alarm systems?  b. Telephone or 2-way radios at the scene of operations?  c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  3. Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency	2.			<i>_</i>	e e		
at the scene of operations?  c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  3. Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  5. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency		â.		<u>/</u>	CONTRACT AND A	estate—exemples	
fire control, spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  3. Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  5. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency		b.		_	<b></b>	**************************************	
3. Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency		C.	fire control, spill control equipment and decontamination	<u></u>			
Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency		Ind	dicate the volume of water and/or fo	am avai	lable	for fir	e control:
Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency						CONTRACTOR OF THE PROPERTY OF	
established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency	3.						
maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency		4 E	established testing and maintenance procedures		Manage of the second	**************************************	
immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  5. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency		b.	maintained in operable	-	ang panggarang ang p	Addis (Americany)	loutdrest be determined
for unobstructed movement?  Has the owner or operator attempted to make arrangements with local authorities in case of an emergency	1,	imm	mediate access to internal	_		Property described.	
to make arrangements with local authorities in case of an emergency /	5.				***************************************	. وتعلق المناس	
	5 <b>.</b>	to	make arrangements with local	,			

(Part 265 Subpart D) YES NO NI Remarks Does the Contingency Plan contain the following information: 265.52 The actions facility personnel must take to comply with . \$265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as police de applicable.) b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to \$265.37? Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators? d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

265.53

2. Are copies of the Contingency Plan available at the site and local

emergency organizations?

3.	Emergency	Coordinator	265.55

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
- c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?
- 4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

152 NO	1/ 1	Kemarks
4		
	1	NO occurence

				Section E:	MANIFES.	SYSTEM, I	RECORDKEE	PING,	AND RE	PORTING: (Part 265 Subpart E	)
							YES		NI	Remarks	
*	1.	Use	of	Manifest Sy	stem 2	65.71					
		ð.	pro pro (Pa the gen	es the facil ocedures listed each straight in the control of the c	ted in §2 h manife: sending a ifest bac	265.71 for st? copy of ck to the		an-define-offendith	. Namenayandada	NOT DISPOSAL FACILITY. NO OFF SITE WASTES	·
		b.		e records of tained for 3		pments	canicomas	4-11-11-11-11	Elling-yyggy-yha		
¥	2.	req	uire	e owner or ements regardancies?	operator ding man 265.72	meet fest	***********				
*	ΰŤ	on-s	ite	ble to owne facilities waste from	that do i	not					
	3.	0pe	rati	ng Record	265.73	•					
	÷	ā.	mai rec	s the owner ntain an ope ord as requ	erating	itor,		<u> </u>	-	· .	
		b.	con	es the operation the following the state of		rd					_
			Ť.	The method of each was storage, or required in Appendix I	ste's tre r disposa n 40 CFR	atment, las		<del>ara juga karaja</del>	washing.		
			4	The location each hazard facility? should be of to specific if waste waste by a manife	ious wast (This ir cross-ref manifes as accomp	e within to formation erenced t number,	:he	grandalings	WARLESTA		
	7	***11	i.	A map or di cell or dis					·		-
	-	*** (	nly	applies to	disposal		E-1			4/82-A	

<sup>\*\*\*</sup> only applies to disposal facilities

			<u> </u>	YES	NO	NI		Remarks	•
			showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)		•	EMB Survey (EF-10)			The Management of the Control of the
	í	٧.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?		reconfessor/motiv	iiban-aanaan			
		٧.	Reports detailing all incidents that required implementation of the Contingency Plan?	-	**************************************	gambidamagah magah			
	V	ń.	All closure and post closure costs as applicable?	MONEROCKET TO UM	**************************************			WWW.	
4.	Āvai	lab	ility of Records 265.74						
	unde	r 4	facility records required O CFR Part 265 available for íon?				-		
5.*	*Unma	nif	ested Waste Reports 265.76						
		haz gen	the facility accepted any ardous waste from an off-site erator subject to 40 CFR 262.20 hout a manifest or or shipping er?		White make transfer	**************************************		Net	
		of des and	"a" is yes, provide the identity the source of the waste and a cription of the quantity, type, date received for each unmanited hazardous waste shipment.	white constraints and the constraints are constraints and the constraints and the constraints and the constraints and the constraints are constraints and the constraints and the constraints are constraints and the constraints and the constraints are constraints are constraints are constraints			to allow toucker.		

<sup>\*\*</sup> Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

#### Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

1.	Hae	the owner or operator of the	YES	NO	ΝI	Remarks
	fac	ility implemented a ground- er monitoring system? 265.90	-		washing-read?	NA
	If	"no", Skip to number 11.				
2.	fac gro	the owner or operator of the ility implemented an alternate undwater monitoring system as cribed in 265.90(d)?	e <sup>ee</sup> OO,OO-mairanae		;	
	If If	"yes", skip to number 12. "no", continue				
3.	sys	s the groundwater monitoring tem meet the following re- rements of 265.91:				
	ā.	At least one well installed hydraulically up-gradient from the limit of the waste management area?	Montemasses	-	· ·	₹
		Indicate the total number of up-gradient wells.				
	b.	At least three wells installed hydraulically down-gradient at the limit of the waste management area?	**************************************	•		
		Indicate the total number of downgradient wells.	P—0	·	·	-
	C.	Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?		,		

8.	an wat	the owner or operator developed outline of a comprehensive grounder quality assesment program that capable of determining: 265.93					
	ā.	Whether hazardous waste or hazardous waste constituents have entered the groundwater?	WINDSON, CONT.	-	ni-constants		
	<b>b.</b>	The rate and extent of migra- tion of hazardous waste or hazardous waste constituents in the groundwater?		**************************************	м		
	C.	The concentration of hazardous waste or hazardous waste constituents in the groundwater?	***************************************	Wildelpage	*RESERVANÇO	·	
*9.	a s wat	the owner or operator performed tatistical analysis of his grounder monitoring data as required in .93(b)?	Advisor	Minimal bayesing	<u> </u>		
10.	inc	there a statistically significant rease (or pH decrease) detected in well?			<u> </u>	4	
	ā.	If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?	***************************************	<b>B</b> enningspaler	<u>X</u>		
		Skip to number 14					
1.	writ	the owner or operator prepared a tten groundwater monitoring waiver onstration for the facility?	-	h <del>r-n</del> cascuca.	Management		
	ð.	Is the waiver demonstration maintained at the facility?					
	b.	Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?		AN FRANCES			
Vote:	. Ir	aspectors should request a conv					

YES NO NI

Remarks

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

<sup>\*</sup>These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

		YES NO NI Remarks
g	Closure 265.112	malu 8PA review -
	a. Is the facility closure plan available for inspection?	indu 8PA review - company seaking approval 
	b. Does the plan identify:	
	i. maximum extent unclosed dur- ing facility life?	
	<pre>ii. maximum hazardous waste in- ventory?</pre>	
	iv. estimated year of closure?	
	v. schedule of closure activities	?
	c. Has closure begun?	
*2.	Post-Closure 265.118	
	a. Is the post-closure plan available for inspection?	
	b. Does this plan contain:	٠.
	i. description of groundwater monitoring activities and frequencies?	<del>-</del>
	ii. description of maintenance activities and frequencies for	
	AA. integrity of cap, final cover, or containment structures, where applicable	
	BB. facility monitoring equip-	
	ment iii. name, address, and phone number of person or office to contact during post-closure care period	
	c. Has the post-closure period begun?	
	d. Is the written post-closure cost estimate available? 265.144	
App <sup>*</sup>		

G-1

4/82-A

Section G CLOSURE AND POST CLOSURE (Par 65 Subpart G)

# Section I - US AND MANGEMENT OF CONTAINERS (Pa.t 265, Subpart I)

		YES NO	NI	Remarks
1.	Are containers in good condition? 265.171		emeranji-i- <u>i-i</u>	
2.	Are containers compatible with waste in them? 265.172		WARRAN COPPERE	
3.	Are containers managed to prevent leaks? 265.173			
4.	Are containers stored closed?		·	
5.	Are containers inspected weekly for leaks and defects.		**************	
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.176	evisio-majoritus.	
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<u> </u>	entremonally.	
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	,		No means at also

#### Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks 1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the NA tank? 265.192 2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? 3. Do continuous feed systems have a waste-feed cutoff? 4. Are waste analyses done before the 265.193 tanks are used to store a substantially different waste than before? 5. Are required daily and weekly inspections done? 265.194 6. Are reactive & ignitable wastes in tanks protected or rendered nonreactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) Are incompatible wastes 265.199 stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) 8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank Ca	hacità:	yaiions				
Tank di	ameter:	feet				
Distanc	e of tank	from property	line	The same of the sa	feet	
(See ta Code -	ble 2 - 1 1977" to	through 2 - 6 determine comol	of NFPA's	"Flammable	and Combustible	Liquids

# Section K - SURFACE IMPOUNDMENTS (Part 265, Subpart K)

y w	Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222			1.A.T.	NA
2.	Do earthen dikes have protective covers? 265.223	terrorente	I NAME OF THE PARTY.	·downwaid	
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225	***************************************		Si-vanuanis,	
4.	Is the freeboard level inspected at least daily? 265.226	TOTAL CONTRACTOR OF THE PARTY O	<del></del>		
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?	Artionisticonia.	STORE THE THE		
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229				
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230				,

# Section L - WASTE PILES (40 CFR Part 265, Subpart L)

		YES	NO	NI	Remarks
].	Are waste piles covered or protected from dispersal by wind? 265.251	TOTAL SERVICE AND ASSESSMENT OF THE PARTY OF	T THE PERSON OF	<b>С</b> амметомогогомогод.	NA
2.	Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	Ť	والإستانات	mmon-sindan-gip	
3.	Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253	and the state of t	**OPERFERENCES	G	
4.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256			· · · · · · · · · · · · · · · · · · ·	
5.	Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?		Who participates the state of t		
5.	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257	STO A MINITED STATES	<del>K-Ministracia</del> v	-	
7.	Are piles of incompatible waste protected by barriers or distance from other waste?				

### Section M - LAND TREATMENT (Part 265, Subpart M)

		YES	NO	NI	Remarks
*	Is treated hazardous waste capable of biological or chemical degradation? 265.272	Compensation	alphonomen and the second second		NA
2.	Are run-off and run-on diverted from the facility or collected		,		
3.	Is waste analyzed according to 265.273?	***************************************	AMERICAN PROVINCE	≠-27b	
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	***************************************		MATERIAL AND	
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278		-ann alama		
6.	Does the unsaturated zone moni- toring plan address the minimum information specified in 265.278?	***************************************		gillingstyngsty	
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279	december of the second	gyan-filifyin-shipun-shipu		
8,	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281	<del></del>	- Constitution of the Cons		
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282	and the state of t	<del></del>		

### Section N - LANDFILLS (Part 265, Subpart N)

			YE2	NU	NI	Remarks
The second	Gen Doe	eral Operating Requirements 265.302 s the facility provide the following:		•		
	ġ.	Diversion of run-on away from active portions of the fill?	<b>Manager Company</b>	processing of the second	COUNTY AND	NA
	b.	Collection of run-off from active portions of the fill?	- Marine and a second	\$0000-000 <sub>-</sub>	Фи-попилания	
	C.	Is collected run off treated?			<del>Grisarranus,</del>	
	d.	Control of wind dispersal of hazardous waste?		<del>- Al-Maryol</del> ogyky		
2.		veying and Recordkeeping 265.309 s the Operating Record Include:				
	a.	A map showing the exact location and dimensions of each cell?	-	N. d	and the second s	
	b.	The contents of each cell and the location of each hazardous waste type withing each cell?		and the same of th		
3.	rea act mix act	cial requirements for ignitable or ctive waste. Are ignitable or re-ive wastes treated so the resulting ture is no longer ignitable or re-ive? (Indicate if waste is ignitable reactive.) 265.312	ATTURETELLA		·	
4.	Spe Was	cial Requirements for Incompatible tes. 265.313				
	of cel	s the owner or operator dispose incompatible waste in separate ls? (If not, the provisions of CFR 265.17(b) apply.)	-	***************************************		

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

	LETINI	nation of Steady State I=inc	inerator	T=th	ermal		nla	
ð.	Тур	e of unit (i.e., type of inc	inerator	or the	rmal ti	reatment):	IVTI	*
b.	Com	ponents and steady state con-	dition:	I 265.	3 <b>4</b> 3 T	265.373	and the second s	
	Was	each component at steady sta	ate prio	r to ad	ding wa	ste?		
		Component	YE	S NO	NI	Remarks		
			. <del></del>		Quantized (Quantized)	anni (M. Communication)		OH - C - C - C - C - C - C - C - C - C -
	Par 1		PPP-049-cus land bear		<del>verse a vez e</del>			
					**************************************	**************************************		<del></del>
					Po-constants	and the second s		<del></del>
Was	te A	nalysis I 265.345	T 268.	. 375				
	Min not	imum requirements, for waste: previously burned/treated.		. 375		The second secon		
Was a.	Min not	imum requirements, for waste:		. 375		*		
	Min not	imum requirements, for wastes previously burned/treated.  Required analyses; has an analysis been performed for		. 375		4		
	Min not	imum requirements, for waster previously burned/treated.  Required analyses; has an analysis been performed for the following?		. 375		-		
	Min not	imum requirements, for wastes previously burned/treated.  Required analyses; has an analysis been performed for the following?  Heating value		.375				
. 5	Min not	imum requirements, for waster previously burned/treated.  Required analyses; has an analysis been performed for the following?  Heating value  Halogen content	s 	.375				

Section Q - CHEMICAL,	PHYSICAL .	AND	BIOLOGICAL	TREATMENT	(Part	265.	Subpart	٥١

		AF 2	NO	MI	Remarks
1.	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401		бо-терменения в при	vicence, secure,	it appears = Treatment was
2.	Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	and the same of th			of copean so Transmont was not Taking place at time and the land of the land o
3.	Has the owner or operator addressed the waste analysis requirements of 265.402?	**************************************	•	V27544 - 1-0 - 1-0 - 1-0 - 1-0 - 1-0 - 1-0 - 1-0 - 1-0 - 1-0 - 1-0 - 1-0 - 1-0 - 1-0 - 1-0 - 1-0 - 1-0 - 1-0 -	100 ayanatio and Treatos
4.	Are inspection procedures followed according to 265.403?	#*************************************		/	
5.	Are the special requirements fulfilled for ignitable or reactive wastes? 265.405		MORNING MICH.	MINISTER AND RECOGNISHED TO SERVICE AND RECOGNISHED TO SERVICE AND RECOGNISHED TO SERVICE AND RECOGNISHED TO S	determined to be
6.	Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406				No magnoclassics

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

longer obsted mittue mixed with waste pocupanion at a controlled, shood pace road not to water. a quest en high state of readion.

Usnita. on water obstate process Tank

with a shield to protee simplanes.

S	e	ct	i	on	Α:	Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

	0. 4					
Sect	ion	B: MANIFEST REQUIREMENTS (Part 262, Subpart	tB)			
			YES	ИО	NI	Remarks
(1)	Doe ava	s the operator have copies of the manifest ilable for review? 262.40		<del></del>		
(2)	mon	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.	2			
(3)	fol cop fes	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manit(s) that do not contain the critical ments). 262.21				
	â.	Manifest document number?	<i>U</i>	₩		All the second s
	b.	Name, mailing address, telephone number, and EPA ID number of Generator		VERMONANCE	4.	***************************************
	C.	Name and EPA ID Number of Transporter(s)?		**************************************	SOCIECE WILLS TYPINGEN	Market Control of the
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?		Фолисования.		
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	***************************************			One soussing unto
	<b>f</b> .	The total quantity of waste(s) and the type and number of containers loaded?		***************************************		,
	g.	Required certification?				
	h.	Required signatures?		<del>~</del>		
(4)	Rep	ortable exceptions 262.42				
	a.	For manifests examined in (2) (except for senter the number of manifests for which the signed copy from the designated facility with ment.	e gene	rator	has N	NOT received a
-	b.	For manifests indicated in (4a), enter the has submitted exception reports (40 CFR 262	numbe 2.42)	r for	r which ne Regi	the generator

Sec	tio	n C: PRE-TRANSPORT REQUIREMENTS (Part 262,	Subp	art	C)		
ų.	wi: (R:	waste packaged in accordance th DOT regulations? equired prior to movement of zardous waste off-site) 262.30		YES	NO	NI	Remarks
2.	in cor (Re	e waste packages marked and labeled accordance with DOT regulations neerning hazardous waste materials? equired for movement of hazardous ste off-site) 262.31 262.32		Child Jung You and	MINISTER ARRESTMAN	Servicensus	
3.	lf tra	required, are placards available to ansporters of hazardous waste? 262.33		Charles and the same of the sa	**********	1	
4.	wit and to	-site accumulation of generated hazardous waste it generates either (A) in its storage of the storage of the containers. If the installation elects option is Section D. If the installation elects options: See 40 CFR 262.34 January 11, 1982 Reports	tacil B re ption ion B	ity stri A,	[265. cts a	l(b)] llaco	or (B) in accordance cumulation to tanks
		Is each container clearly marked with the start of accumulation date?		V	/		
	b.	Have more than 90 days elapsed since the date inspected in (a)?	į				
	с.	Do wastes remain in accumulation tanks for more than 90 days?	-		-		·
	d.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	_				
sec.	tion	D: - RECORDKEEPING AND REPORTING (Part 262	2, Su	r bpar	t D)		
•	nee min	all test results and analyses ded for hazardous waste deterations retained for at least ee years? 262.40	-	YEŞ	NO V	NI	Remarks
sec.	tion	E: - INTERNATIONAL SHIPMENTS (Part 262, Su	ibpari	t E)	į		
<u> </u>	Has exp	the installation imported or orted Hazardous Waste? 262.50	_	<del></del>		•	
•	(If as	answered Yes, complete the following applicable.)			•		
	đ٠	Exporting Hazardous waste; has a	•				

### Appendix TR

Sec	tion A: SCOPE:	YES	NO	NI	Remarks
] .	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.	enemants arising.	EAU RECOUNT-MENS	West-off-see.	NA
2.	Does the transporter transport hazardous waste into the U.S. from abroad?	•	**************************************	(3:03	
3.	Does the transporter transport hazardous waste out from the U.S.?	NO-MARKET AND ASSESSMENT ASS	G0000000000000000000000000000000000000	O <del>-CCODOMA-O</del> A	
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	aller Street and Street	<del>4-120</del>	POTOESSAMBAL-SAGA	
Sect	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part	263	, Subpa	art B)
1.	Are copies of completed manifests available for review and retained for three years. 263.22	Novel of the least	POLICE		
2.	Estimate the number of manifests for shipments completed during the part 6 months.			The second second	
3.	Examine a representative number of manifests. Indicate number examined.	- Control of the Cont	······································		•
4.	Did transporter properly sign and date the manifests examined?	<del>VP-PER-ACCIONISTO</del>	8-48	The Maryon.	
	Do any manifests indicate shipments delivered to other than the designated facility? 263.21	storenaments,	<b>₩</b> ессиотельная	<b>От-полического</b>	
	If (5) is "no," skip 6 and 7.			-	
	Do any manifests indicate shipments delivered to other than an alternate facility?	MINISTER (III. add.	GE-WYGE-WARREN	W	
	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?	MINISTER GOODS	на по америја (пор		

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

IACOB A. HOEFER ROBERT HOLMES E. M. LAITALA HILARY F. SNELL PAUL H. WENDLER HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING BOX 30028 LANSING, MI 48909 HOWARD A. TANNER, Director Hazardous Waste Division 9311 Groh Road Grosse Ile, Michigan 48138

August 5, 1983

Mr. Rudy Merriweather Plant Manager BASF Wyandotte Corporation 1700 Blaney Drive Troy, Michigan

RE: MID 057007478

Dear Mr. Merriweather:

On July 25, 1983, your plant was inspected to determine compliance with Subtitle C of the Resource Conservation and Recovery Act of 1976, as amended (RCRA). The facility generates and stores hazardous waste and is subject to the Act.

No violations of the RCRA Generator or Interim Status Standards were observed during the inspection.

Thank you for your cooperation. Feel free to contact me at (313) 675-0860 if you have any questions.

Sincerely.

William E. Stoney William E. Stone

Water Quality Specialist

Compliance Section

Hazardous Waste Division

WES/sc

cc: Ken Burda (3)

e.de O

#### RCRA Inspection Report

EPA Identification Number: M I I	05700	7479
Installation Name: BASF W		
Location Address: 1700 .81	•	
City: Troy	State: Mi.	
Date of inspection: $\frac{7/25/83}{}$	Time of inspection (from)	9:45a (to) 12:30p
Person(s) interviewed	Title	Tel ephone
Dale Roush	Super Environmental Affa	irs 313) 282-3300
Rudy Merriweather	Plant Manager	•
Inspector(s)	Agency/Title	Tel ephone
William E. Stone	MIDNR-HWD/WAS	313) 675-0860
Installation Activity (mark only on	e box)	<pre>Inspection Form(s)</pre>
Treatment/Storage/Disposal per 4 Generation and/or Transportation	storage app. and go into	plan to withdraw their ugh closured when their
	Part B is called in.	
☐ Generation and Transportation		B, C
☐ Generation only		В
		C
The plant blends rac	w materials to make	ke resins
and isocyanates for wrethan Two wastes are genera	ited. I monhazardous i	waste resins
which are disposed of at city	Disposal 2) Waste isoc	exanates (0002).
The isocyanates were being dispo- have been stored on site & since	sed of at AlBurn in a diked pod) Alburn was close	d(in 55 gal drums).
Sixteen (16) drums have been ac	cumulated in 10 month the waste was ma	s. They could quality uneged differently.
2: ken Burde The company has contracted company waste and incinerate it at	with SCH of Chicago their facility in ea	rly August.

#### INSPECTION FORM A

#### Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit appli	catio	n process(es) (EPA Form 3510-3) Inspe	ection Form /	<pre>\ section(s)</pre>
501	X	storage in containers 55 gel dru	.WS	I
\$02		storage in tanks		J
TOI	$\prod$	treatment in tanks		J
504		storage in surface impoundment		K,F
T02		treatment in surface impoundment		K,F
D83	П	disposal in surface impoundment		K, F
\$03		storage in waste pile		Ļ
D81		disposal by land application		M,F
080	Ш	disposal in landfill		N,F
Т03	П	treatment by incineration		0/P
T04		treatment in devices other than tanks impoundments, or incinerators	, surface	Q
Other activities	<u>.</u>			
GENERATOR	X	•	APPENDIX	GN
TRANSPORTER			APPENDIX	TR

- Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
- 4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

YES NO NI* Remarks  1. Has the Regional Administrator been notified regarding: 265.12  2. Receipt of hazardous waste from a foreign source?  3. Facility expansion?  4. Change of owner or operator?  5. General Waste Analysis: 265.13  2. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?  5. Does the owner or operator have a detailed waste analysis plan on file at the facility?  6. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?  7. Security - Do security measures include: (if applicable) 265.14  2. 24-Hour surveillance?  5. La Artificial or natural barrier around facility?  2. Danger sign(s) at entrance?  3. Does the owner or operator inspections: 265.15  2. Does the owner or operator inspections: 265.15  3. And it controlled entry?  4. Owner or operator inspections: 265.15  4. Does the owner or operator inspections: 265.15			SECTION B. GENERAL PACILI	II SIA	WUNKU2	: (Part	200 Subpart B)
been notified regarding: 265.12  a. Receipt of hazardous waste from a foreign source?  b. Facility expansion?  c. Change of owner or operator?  2. General Waste Analysis: 265.13  a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?  b. Does the owner or operator have a detailed waste analysis plan on file at the facility?  c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?  3. Security - Do security measures include:     (if applicable) 265.14  a. 24-Hour surveillance?     or     b. Artificial or natural barrier around facility?     and     ii. Controlled entry?  c. Danger sign(s) at entrance?  1. Owner or operator inspections: 265.15  a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or				YES	NO	NI*	Remarks
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specify procedures for inspection and analysis of each movement of hazardous waste from off-site?  NHT no off site  NHT no off site  NHT no off site  Security - Do security measures include:     (if applicable) 265.14  a. 24-Hour surveillance?     or b. i. Artificial or natural barrier around facility?     and     ii. Controlled entry?  c. Danger sign(s) at entrance?  4. Owner or operator inspections: 265.15  a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or		b.	a detailed waste analysis plan	<u>_</u> <u>\</u>	\$454Q340-6m2rm	only	one waste
(if applicable) 265.14  a. 24-Hour surveillance?  or  b. i. Artificial or natural barrier around facility?  and ii. Controlled entry?  c. Danger sign(s) at entrance?  4. Owner or operator inspections: 265.15  a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or		c.	specify procedures for inspection and analysis of each movement of	<b>б</b> илоскиями <b>л</b> уш		Этотнатамира	
or b. i. Artificial or natural barrier around facility? and ii. Controlled entry?  c. Danger sign(s) at entrance?  4. Owner or operator inspections: 265.15  a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or	3.	Sec	urity - Do security measures include (if applicable) 265.14	Б •			
b. i. Artificial or natural barrier around facility? and ii. Controlled entry?  c. Danger sign(s) at entrance?  4. Owner or operator inspections: 265.15  a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or		ð.		Processors		-	Beatle recording to the second
ii. Controlled entry?  c. Danger sign(s) at entrance?  d. Owner or operator inspections: 265.15  a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or		b.	i. Artificial or natural barrier around facility?	X		MATERIA MATERIA	
entrance?  4. Owner or operator inspections: 265.15  a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or				1		*********	
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or		C.					
inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or	1.	0wn	er or operator inspections: 265.15				
		à.	inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or	X	- Tanking (SEC)		

		YE 2	NU	NI	Remarks
hav	s the owner or operator e an inspection schedule the facility?	×	Bald-granessess		
	so, does the schedule address inspection of the following ms:				
<b>,</b> *	monitoring equipment?	***************************************	*****	***************************************	NA
ii.	safety and emergency equipment?	x		A-reconstructive and a second	
iii.	security devices?	*			
iv.	operating and structural equip- ment (i.e. dikes, pumps, etc.)?	×		***************************************	•
<b>V.</b>	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	X	-	·	
vi.	inspection frequency (based upon the possible deterioration rate of the equipment)?	X	*****	***************************************	
d. Are ed	areas subject to spills inspect- daily when in use?	X		*	
an	s the owner or operator maintain inspection log or summary of er or operator inspections?	X		<del></del>	
f. Doe fol	s the inspection log contain the lowing information:				
•	the date and time of the inspection?	*			
ii.	the name of the inspector?	×			
iii.	a notation of the observations made?	X	www.cooperg.	**************************************	
îv.	the date and nature of any repairs or remedial actions?	<u> </u>		,	
- <b>-</b> .	training records 65.16				
a. Job	titles?	<u>×</u>	All of the control of	-	
b. Job	descriptions?	X	***************************************	-	

5.

			YES	NO	NI	Remarks
	C.	Description of training?	X	THORESTARES		
	d٠	Records of training?	X		<del></del>	
	е.	Did facility personnel receive the required training by 5-19-81?	*	decident and any of the second		
	f.	Do new personnel receive required training within six months?	***************************************	Ф-муческого	<u></u>	
	9.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?	1	<b>*</b>		
6.	req	required, are the following special quirements for ignitable, reactive, incompatible wastes addressed? 265.1	7			
	۵.	Special handling?	*			NA
	b.	No smoking signs?	1		***************************************	11
	C.	Separation and protection	44444			ν

### Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

	0000111	2, 11/E1/11/EDITEON	ALLO LIVEACIALEOLA	" (LO	ic 203 Subparc C)
<b>P</b>	Maintenance and Oper of Facility: 265.3		YES NO	NI	Remarks
	Is there any evid explosion, or rel hazardous waste o waste constituent	ease of r hazardous		and the same of th	
2.	If required, does th have the following e		•		
	a. Internal communi alarm systems?	cations or		- The second	ADT Five Alarm - sprintler 3 manual switches
	b. Telephone or 2-w at the scene of		X _	***************************************	Teri phone
	c. Portable fire ex fire control, sp equipment and de equipment?	ill control	<u> </u>	becomment.	
	Indicate the volume	of water and/or f	oam available	for fi	re control:
	absorbant, TD	•			•
	2 Dry Chem	ext. near 6	y storage	area	. Municipal Water
3.	Testing and Maintena Emergency Equipment:		•		
	<ul> <li>Has the owner or established test maintenance proc for emergency eq</li> </ul>	ing and edures	<u> </u>	p.Manterrockedu	monthly
	b. Is emergency equivalent maintained in op- condition?		<b>X</b> —		
4.	Has owner or operato immediate access to alarms? (if needed)	internal	<u> </u>	***************************************	
5.	Is there adequate ai for unobstructed mov		<u> </u>	<del></del>	
6.	Has the owner or ope to make arrangements authorities in case at the facility?	with local	<u>X</u>		Fire Dept. has inspected and our merriweather has given them training at their station.  Beaument Hospital 4/82-A
					nas company's surrgency flo and safety data sheets

### Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

] *	Does	the	Conti	ingend	:y Р'	lan	contain	the
	foll	owing	info	omat:	ion:		265.52	

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

3				
			٠	
~ «	-000	-		

X

X

X \_\_ \_

			YES	NO	NI	Remarks
3.	Eme	rgency Coordinator 265.55				
	à.	Is the facility Emergency Coordinator identified?	X	t Killing Kandalayayanga		
	b.	Is coordinator familiar with all aspects of site operation and emergency procedures?	X	:	PERMIT	
	С.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
4.	Eme	rgency Procedures 265.56				
	at Coo	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency occurred listed in 265.56?				

			Section E:	MANIFEST SY	STEM, RE	CORDKEE	PING,	AND RE	PORTING: (Part 265 Subpart E)
					,		NO	NI	Remarks
* ].	Use	of N	lanifest Sy	stem 265.	71				
	đ₄	proc proc (Par the gene	edures lis essing eac ticularly signed map	ity follow to ted in \$265. In mapifest? sending a co ifest back to in 30 days a	71 for opy of to the	MAN-my-mg	,	Ministerran	·
	b.		records of lined for 3	past shipme years?	ents		Aproprosides assess	en e	
* 2.	p∕eq	uiren	e owner or ments regar incies?	operator mee ding manifes 265.72	et St	<del>(3-(3-(3-1-</del>	*************************	P-savascosa	
05	on-s	ite 1	acilities	rs or operat that do not off-site so					
3.	0pe	ratin	ng Record	265.73					
	ā.	mair	ntain an op ord as requ		*	<u>X</u> _		·	Tely on their manifests
	b.	cont	the opera tain the fo ormation:	ting record llowing					Tely on their manifests since no off-site waste is accepted
		i.	of each wa storage, o	(s) and date ste's treatr r disposal a n 40 CFR Par ?	ment, as	+	<b>=</b> 04,—04, <b>≈</b> 2		only one of storage area, only one waste type, drums are dated when
		î î <b>.</b>	each hazar facility? should be to specifi	on and quant dous waste waste was (This informationss-refered communities was accompant est.)	within th rmation enced rumber,	e		manufacture day	put in storage.  Manifests document when shipped for disposal  See above
	***i	ii.		iagram of ea sposal area	och .				
-		40	<b>.</b>						
-	* * *	only faci	applies to lities	disposal		E-1			4/82-A

			153	140	14.7	Kellark 2
		showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	***************************************		<u>NA</u>	
	iv.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X			
	٧.	Reports detailing all incidents that required implementation of the Contingency Plan?	Opposite and a			<u> </u>
	٧i.	All closure and post closure costs as applicable?	X	***********		
ŧ.,	Availat	oility of Records 265.74				
		l facility records required 10 CFR Part 265 available for tion?	1	<del></del> ,	alexandring:	
5. <b>'</b>	**Unmanii	fested Waste Reports 265.76				
	haz ger wit	s the facility accepted any zardous waste from an off-site nerator subject to 40 CFR 262.20 thout a manifest or or shipping per?	**************************************		Named to Angel State Sta	
	of de: and	"a" is yes, provide the identity the source of the waste and a scription of the quantity, type, d date received for each unmanisted hazardous waste shipment.	MANAGE - COMPANY OF STREET			
			•			
	** No	t applicable to owners or operator y hazardous from off-site sources.	s of	on-si	te faci	lities that do not receive

### Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

faci	lity implemented a ground-	YES	NO	NI	Remarks
	200.00	<b>VIII</b>	***************************************		And the second s
faci grou	lity implemented an alternate ndwater monitoring system as				
If "	yes", skip to number 12. no", continue				
syst	em meet the following re-				
	hydraulically up-gradient from the limit of the waste manage-	Management of the Control of the Con	Commission of the Control of the Con		₹
/	Indicate the total number of up-gradient wells.				
	hydraulically down-gradient at the limit of the waste manage-				
	Indicate the total number of downgradient wells.	·	-	-	
С.	Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?	· · ·		<b>SALESTRES</b>	
	facie wate "Hasiouc "Hasiouc "If "Bosysta quir a. b.	hydraulically up-gradient from the limit of the waste management area?  Indicate the total number of up-gradient wells.  b. At least three wells installed hydraulically down-gradient at the limit of the waste management area?  Indicate the total number of downgradient wells.  c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of	Has the owner or operator of the facility implemented a ground-water monitoring system? 265.90  If "no", Skip to number 11.  Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)?  If "yes", skip to number 12.  If "no", continue  Does the groundwater monitoring system meet the following requirements of 265.91:  a. At least one well installed hydraulically up-gradient from the limit of the waste management area?  Indicate the total number of up-gradient wells.  b. At least three wells installed hydraulically down-gradient at the limit of the waste management area?  Indicate the total number of downgradient wells.  c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of	Has the owner or operator of the facility implemented a ground-water monitoring system? 265.90  If "no", Skip to number 11.  Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)?  If "yes", skip to number 12.  If "no", continue  Does the groundwater monitoring system meet the following requirements of 265.91:  a. At least one well installed hydraulically up-gradient from the limit of the waste management area?  Indicate the total number of up-gradient wells.  b. At least three wells installed hydraulically down-gradient at the limit of the waste management area?  Indicate the total number of downgradient wells.  c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of	Has the owner or operator of the facility implemented a ground-water monitoring system? 265.90  If "no", Skip to number 11.  Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)?  If "yes", skip to number 12.  If "no", continue  Does the groundwater monitoring system meet the following requirements of 265.91:  a. At least one well installed hydraulically up-gradient from the limit of the waste management area?  Indicate the total number of up-gradient wells.  b. At least three wells installed hydraulically down-gradient at the limit of the waste management area?  Indicate the total number of downgradient wells.  c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of

Sketch the locations of the wells relative to the waste management area.

			YES	NO	NI	Remarks
	d.	Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?			-	
4.	deve wate pla	the owner or operator eloped a written ground- er sampling and analysis n that includes procedures techniques for: 265.92				
	ð.	Sample collection?			*****	
	b.	Sample preservation and shipment?	· ·		######################################	
	С.	Analytical procedures?				
	d.	Chain of custody control?				
5.	fol	s the owner or operator low his groundwater sampling analysis plan?			***************************************	
6.	ana	the groundwater sampling and lysis plan maintained at the ility?				
7.	of a para ance	the owner or operator deter- ed the concentration or value all the groundwater monitoring ameters of 265.92(b) in accord- e with paragraphs c and d of				
,	265	.92?	·····		•	

8.	an <u>o</u> wate	the owner or operator developed outline of a comprehensive grounder quality assesment program that capable of determining: 265.93				
		Whether hazardous waste or hazardous waste constituents have entered the groundwater?		/	-	
	Ď.	The rate and extent of migra- tion of hazardous waste or hazardous waste constituents in the groundwater?	· ·		-	· · · · · · · · · · · · · · · · · · ·
	C.	The concentration of hazardous waste or hazardous waste constituents in the groundwater?				
*9.	a st wate	the owner or operator performed atistical analysis of his grounder monitoring data as required in .93(b)?	ORNAL SANSANTONIO	May to a summary of the summary of t	<u>X</u>	
*10.	inci	there a statistically significant rease (or pH decrease) detected in well?		annistrija.	X	
	à.	If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?  Skip to number 14	denote the second of the secon		<u>x</u>	
11.	wri	the owner or operator prepared a ten groundwater monitoring waiver onstration for the facility?	Mary Marketing.		•	
	a.	Is the waiver demonstration maintained at the facility?	8-13-T-12-M-20-20-20-20-20-20-20-20-20-20-20-20-20-		www.company	
	<b>b.</b> //	Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?		with the same of t	***tomas	
\$1 - A - 1						

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

<sup>\*</sup>These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

		YES	NO	NI	Remarks
12.	Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?		—		- Marie - Manager Application - Application
	a. Has the plan been certified by a qualified geologist or geotechnical engineer?				
Note: to th	If the plan for an alternate groundwie Regional Administrator the inspector	vater shou	mon mon	itoring sy request a	vstem was not submitted copy for review.
13.	Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?	***************************************	Ministra in the second		
14.	Does the owner or operator submit reports and maintain records as required in 265.94?				

					YES	NO	NI	Remarks	
Ì .	Clo	osure	265	5.112					
	ð.	Is pla	the f n ava	acility closure ilable for inspection?	X	<i></i>			
	b.	Doe	s the	plan identify:					
		Î.		mum extent unclosed dur- facility life?			Managemap	_NA	
		ii.	maxi vent	mum hazardous waste in- ory?	X	\$*************************************	Marine and Artificial Section 2018		
		iv.	esti	mated year of closure?	-	T-CE-SEAD-SA	-	NA	
		٧٠	sche	dule of closure activities?	X		-		
	С.	Has	clos	ure begun?		$\times$			•
2.	Pos	st-Cl	osure	265.118					
	a.	Is for	the p	ost-closure plan available ection?		_			
	ь.	Doe	s thi	s plan contain:		<i>J</i> :		4	
		j.	moni:	ription of groundwater toring activities and uencies?	/ 			•	
		ii.		ription of maintenance vities and frequencies					
			AA.	integrity of cap, final cover, or containment structures, where applicable	B. 44400	*Ottomanno.	WOODS-		
			BB.	facility monitoring equip-					2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
	i	ii.	of ø	ment address, and phone number erson or office to contact ng post-closure care period		***************************************			
	c.	Hag	the p	post-closure period begun?		<del></del>	***************************************		
	d./	Is est	the wi	ritten post-closure cost available? 265.144		_			
onn'	/			disposal facilities	<del>eracióle recuesqu</del> p		Sideramop Consis	-	**************************************

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Section G CLOSURE AND POST CLOSURE (Part \_65 Subpart G)

# Section I - US: AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		1F2	NU	N I	Remarks
1.	Are containers in good condition? 265.171	<u>X</u>	<del>** **********</del> *	45aran-1000-100	
2.	Are containers compatible with waste in them? 265.172	<u>\( \lambda \) \( \lambda \) \</u>	DOSESSI why will provide the p	SSECTION SERVER	
3.	Are containers managed to prevent leaks? 265.173	X	The state of the s	P	
4.	Are containers stored closed?	X	***	***************************************	vented to prevent cos
5.	Are containers inspected weekly for leaks and defects.	X	en e	**************************************	3x/wk
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.776		and the second	NA
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177		в-м <sup>2</sup> фексонский		NA
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	-	-		NΑ

## Section J - TANKS (Part 265, Subpart J)

	YES NO NI Remarks
].	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192
2.	Do uncovered tanks have at least 60 cm (2 feet) of free- board, or dikes or other con- tainment structures?
3.	Do continuous feed systems have a waste-feed cutoff?
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?
5.	Are required daily and weekly inspections done? 265.194
6.	Are reactive & ignitable wastes in tanks protected or rendered non- reactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)
7.	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)
8.	Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?
	Tank capacity:gallons
	Tank diameter:feet
	pistance of tank from property line feet
	(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

## Section K - SURFACE IMPOUNDMENTS (Part 265, Subpart K)

Ϊ.	Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222	YES -	IVU	N I	Remarks	
2.	Do earthen dikes have protective covers? 265.223	· CONTROL CONTROL				The state of the s
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225	_/_			No. of the last of	
4.	Is the freeboard level inspected at least daily? 265.226		······································	<del></del>	-	
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?	Alexander Residence		MEMA-ph-papage		
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229					
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265 77(b) apply.) 265.230				,	

	SECTION F - MASTE LIFE?	(40 C	FR Pa	rt 205,	Subpart L)
		YES	NO	NI	Remarks
1.	Are waste piles covered or protected from dispersal by wind? 265.251	water (week	<del>Diri yanki yak</del>	working the second of the seco	
2.	Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	;		_/	
3.	Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253	***************************************			
4.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256		**************************************	Market and an artist of the second	
5.	Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	enany-page.	Featervenance	emple superiorizable	-
6.	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257		-	· · · · · · · · · · · · · · · · · · ·	
7.	Are piles of incompatible waste protected by barriers or distance from other waste?				

### Section M - LAND TREATMENT (Part 265, Subpart M)

١.	Is treated hazardous waste capable of biological or chemical degradation? 265.272	YES.	NU	N I	Remarks
2.	Are run-off and run-on diverted from the facility or collected		•		
3.	Is waste analyzed according to 265.273?	ALCONOMIC STREET	<u>/</u>		
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	/_	<u></u>		
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the Mazardous waste available? 265,278	www.		, and the same of	
6.	Does the unsaturated zone moni- toring plan address the minimum information specified in 265.278?	***************************************		**************************************	
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279	چېدند چېد		ommony kilokukiti	
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281	бен пано-чемена	e. approximation		
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282	* Appelluljike***Photol	me —monte-spiritered#V		

Section N - LANDFILLS	(Part	265,	Subpart	N)
-----------------------	-------	------	---------	----

			163	NO	14 T	Reliarks
đ		eral Operating Requirements 265.302 s the facility provide the following:		÷		
	d.	Diversion of run-on away from active portions of the fill?			· · · · · · · · · · · · · · · · · · ·	
	b.	Collection of run-off from active portions of the fill?		<del></del>	/	
	C.	Is collected run off treated?		/	_	:
	d.	Control of wind dispersal of hazardous waste?	/	_		
2.		veying and Recordkeeping 265.309 s the Operating Record Include:				
	ā.	A map showing the exact location and dimensions of each cell?	**************************************	<del></del>		•
	þ.	The contents of each cell and the location of each hazardous waste type withing each cell?	No.		err-40-t-**lear40	
3.	rea act mix act	cial requirements for ignitable or ctive waste. Are ignitable or re- ive wastes treated so the resulting ture is no longer ignitable or re- ive? (Indicate if waste is ignitable reactive.) 265.312	WWW.COMPAGE.			_
4.		cial Requirements for Incompatible tes. 265,313				
	of cel	es the owner or operator dispose incompatible waste in separate ls? (If not, the provisions of CFR 265.17(b) apply.)		·		
	Not	e: If waste is rendered non-reactive If not, the provisions of 40 CFR				see treatment requirements.

	YES	NO	NI	Remarks
--	-----	----	----	---------

- 5. Special requirements for liquid waste 265.314
  - a. Are bulk or non-containerized liquids placed in the landfill? If "yes," complete items i, ii, and iii.
    - i. Does the landfill have a chemically and physically resistant liner system?
    - ii. Does the landfill have a funetional leachate collection system?
    - iii. Are free liquids stabilized
       prior to or immediately after
       placement in the landfill?
  - b. Have containers holding free liquids been placed in landfill since March 22, 1982?
- 6. Special requirements for Containers
  Are empty containers crushed flat, 265.315
  shredded, or similarly reduced in volume
  before being buried beneath the surface
  of the landfill?

termination of Steady State  I=inciner	rator T=th	ermal	
Type of unit (i.e., type of inciner	ator or the	ermal ti	reatment):
Components and steady state conditi	ion: I 265.	343	265.373
Was each component at steady state	prior to ad	lding wa	aste?
Component	YES NO	NI	Remarks
	Marriage and State of the State	4-107	
		accession and the second	
ste Analysis I 265.345 I  Minimum requirements, for wastes not previously byrned/treated.	Г 265.375		<b>q</b>
i. Required analyses; has an analysis been performed for the following?			
Heating value			
Halogen content		to dila	
Sylfur content			
/			
ii. Mas documented or written data been substituted for analysis of either:			
been substituted for analysis			
been substituted for analysis of either:	Антируппанам учинализми		

2.

	b.	List other paramters for which the waste establish steady state or determine the (Note in Remarks any which you feel shou	tvoes	of bol	llutant	le owner or operator to s which may be emitted.
			YES	NO	NI /	Remarks
3.	Mon.	itoring and Inspections I 265.347 T 265.37		,		
	5 €	Are combustion/emission control instruments monitored at least every 15 minutes?			ACTIONS N. A. G.	
	b.	Is steady state maintained or corrections attempted?		фОтимина	· modicano anos	
	c.	Is stack plume observed at least hourly for normal color and opacity?			and the second	
	d.	Did any stack observations made by owner or operator show a plume different than normal?**	**************************************			
	e.	If "yes" to (d) above, were corrections made to return emissions to normal appearance?**		annual malantage (Sp		
	f.	Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?		professor(0)		
*:	*Spec	cify in Remarks for what period of time s was checked.				•
	g.	Are emergency shutdown controls and system alarms checked daily for proper operation?	4			
4.	<u> Ope</u>	n Burning T 265.382 (open burning does no	t app	ly to i	incinera	ation)
	a.	Only complete this part if the facility open burns hazardous waste.				
		i. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned).		menne e mille kollek		

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ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

Pounds of waste explosives or propellants	burning or	stance from detonation of others	
0 to 100	204 m 380 m 530 m 690 m	670 1,250 1,730 2,260	ft ft

#### Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

		YES	NO	NI	Remarks
	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	<del></del>	<u> </u>	42-4-Feaveninesse	<u></u>
2.	Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?		_		
3.	Has the owner or operator addressed the waste analysis requirements of 265.402?	_			
4.	Are inspection procedures followed according to 265.403?		······································		
5.	Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	WESTED TAKENAM MAA	Филопения	<del></del>	
6.	Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406				

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

Section A: Scot	ion A: Scop	рe
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omplete this Appendix if the owner or operator of a TSD facility also generate	
azardous waste that is subsequently shipped off-site for treatment, storage,	
r disposal.	

Sect	ion E	3: MANIFEST REQUIREMENTS (Part 262, Subpart	B)			
			YES	МО	NI	Remarks
(1)		s the operator have copies of the manifest ilable for review? 262.40	X	waran palam	15/000 <del>**********************************</del>	
(2)	mon'	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.		l m	9/8	12
(3)	fol' cop fes	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21				
	ð.	Manifest document number?	X	howare-america		
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	X		**************************************	
	c.	Name and EPA ID Number of Transporter(s)?	X	electronical control	Onlikeyi manamalk	Managari Maradha Andri an ann ann Ramannann ag 1910 sha fannadh an dainn an ann ann an
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	45	X	-	made error -has
	€.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	quinte surind	formal formal managers	since been correct
	f.	The total quantity of waste(s) and the type and number of containers loaded?	<u>×</u>	Otherwister	<del>mosespinsey,</del>	
	g.	Required certification?	X			
	h.	Required signatures?	X	-	4,004,444,440	
(4)	Rep	portable exceptions 262.42				
	ĉ.	For manifests examined in (2) (except for senter the number of manifests for which the signed copy from the designated facility we ment.	e gen	erator	~ has !	NOT received a
	b	For manifests indicated in (4a), enter the	numb 2.421	er for	r whic	h the generator

Sect	tion C: PRE-TRANSPORT REQUIREMENTS (Part 26	62, Subpart	C)		
1.	Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	YES	NO .	NI	Remarks
2.	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32				
3.	If required, are placards available to transporters of hazardous waste? 262.33	<u>X</u>			
4.	On-site accumulation of generated hazardous waste it generates either (A) in its storage with 40 CFR 262.34 [see 265.1(c)(7)]. Optional containers. If the installation elects to Section D. If the installation elects of tions: See 40 CFR 262.34 January 11, 1982	ge facility ion B restri s option A, option B, co 2 Revision	[265. cts a check mplete	l(b)] ll acc this e the	or (B) in accordance umulation to tanks box XI and skip following observa-
	a. Is each container clearly marked with the start of accumulation date?	e (- 	ect foll	A b lowing	ut have done:
	b. Have more than 90 days elapsed since the date inspected in (a)?		war War Ward Cons		
	c. Do wastes remain in accumulation tanks for more than 90 days?				-
	d. Is each container and tank labeled or marked clearly with the words "Hazardon Waste"?	us 			
Sec	tion D: - RECORDKEEPING AND REPORTING (Part	262, Subpar	t D)		
<b>T</b> .	Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	YES	NO	NI	Remarks
Sec	tion E: - INTERNATIONAL SHIPMENTS (Part 262	, Subpart E)			
1.	Has the installation imported or exported Hazardous Waste? 262.50		X	************	
	(If answered Yes, complete the following as applicable.)				
	<ul> <li>Exporting Hazardous waste; has a generator:</li> </ul>	·			

			152	ΝU	N I	Kemarks		
i		ified the Administrator in ting?	-	\$AlphapulPubasiDe(co		Security to the second security of the second secon	ARSO-S-MAN-MAN-MAN-MAN-MAN-MAN-MAN-MAN-MAN-MAN	<b>-</b> W-
	ii.	Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?	WEED CONTROL OF COLUMN TWO	**************************************	***************************************			
	iii.	Met the Manifest requirements?	TODAY CONTRACT			#44-0		
b.	the g	ting Hazardous Waste; has enerator met the manifest rements?	<del>2014-14000000</del>	Alexander and the second				

# BASF Wyandotte Corporation

September 27, 1982



Wyandotte, Michigan 48192 313 282-3300

Telex: 0230-647 (BASFWYANA WYTE) TWX: 810-231-5750 (BASFWYAN)

Hien Q. Nguyen, CE Michigan Department of Natural Resources Resource Recovery Division P. O. Box 30028 Lansing, MI 48909

Dear Mr. Nguyen:

Re: RCRA Compliance Inspection at BASF Wyandotte Corp. (BWC), Troy, Mich., MID057007478, 24 September, 1982.

The purpose of this letter is to confirm that the two (2) items which at the time of your inspection were questionably in compliance have been resolved. These issues are satisfactorily explained as follows:

 Section 265.176 - General requirements for ignitible, reactive, or incompatible wastes.

This regulation requires ignitible and reactive wastes be stored at least 15 meters (50 feet) from the facility property line.

#### BWC Response

The drummed hazardous waste is not a listed waste and has not been characterized as ignitible or reactive. Toluene diisocyanate is simply a component in the waste. The material has been identified on the Waste Characterization Report, previously submitted to your Division, as Corrosive Liquid. Poisonous NOS Hazardous Waste No. D002. Hazard Class-Corrosive Material. This waste is not subject to the 15-meter regulation.

(2) Enclosed please find a copy of Michigan Manifest No. MI 0173828 which describes the material shipped to Triangle Resource Industries (TRI). The required signatures are present.

If more information is needed or questions are yet unanswered, please do not hesitate to contact me.

Very truly yours,

H. D. Roush

Manager

Quality Assurance, Hygiene and Environmental Protection

HDR/mh enc.

RECEIVED

SEP 2 9 1982

RESOURCE RECOVERY DIVISION OFFICE

STATE OF MICHIGAN

Hov. 8/01

RCRA Inspection Report El Identification Number: M I D 0 5 7 0 0 7 4 7 8 BASE WYANDOTTE CORP. Installation Name: 1700 BLANEY DRIVE Location Address: State: MI 48084 City: TROY Time of inspection (from) (1:10 MM Date of inspection: 9/24 Telephone Title Person(s) interviewed (313) 282-3300 anv. Manger MERRIWEATHER Plant (313) 643-0880. Telephone (517) 373 - 1818 Agency/Title Inspector(s) MICH DHR / ENGINEER HIEN O. NGUYEN Inspection Form(s) Installation Activity (mark only one box) Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation Treatment/Storage/Disposal (no generation or Transportation) B, C Generation and Transportation TT Generation only Transportation only REMARKS: There was only one drum stored on site which has vent pipe installed for pressure relief (Probably to prevent pressure build up. when drum contents are heated by warm temperature) The company indicated that their waste is non-reactive and non-flammable. ( See letter attached )

> OCT 07 1982 ACT 6

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#### Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit appli	<u>cation</u>	n process(es) (EPA Form 3510-3) In	spec	tion Form	A section	on(s)
102	II	storage in containers			I	
\$02		storage in tanks		· · · · .	J	
701		treatment in tanks		•	J	
\$04		storage in surface impoundment			K,F	
T02		treatment in surface impoundment			K,F	
D83		disposal in surface impoundment	ē	•	K,F	
\$03		storage in waste pile			L	
D81		disposal by land application		•	M,F	
D80		disposal in landfill		•	N, F	
T03		treatment by incineration	-		0/P	
. T04		treatment in devices other than tan impoundments, or incinerators	iks,	surface	Q	
ther activities				•	· ·	
GENERATOR	IF			APPENDIX	(GN)	· .
TRANSPORTER	II			APPENDIX	TR	

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

MONE

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

NONE

		Section B: GENERAL FACILI	IY STAN	DARDS:	(Part	265 Subpart B)
			YES	NO	NI*	Remarks
1.		the Regional Administrator n notified regarding: 265.12				÷
	g.	Receipt of hazardous waste from a foreign source?			<del></del>	
÷	b.	Facility expansion?				
	C.	Change of owner or operator?		<u> </u>		
2.	Gen	eral Waste Analysis: 265.13	. <del>-</del>			e e e e e e e e e e e e e e e e e e e
	ā∗	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	$\leq$			
	Ь.	Does the owner or operator have a detailed waste analysis plan on file at the facility?				
	C.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	NA	·		No hazardous wasts.  how off nite
3.	Sec	curity - Do security measures include (if applicable) 265.14				
	g •	24-Hour surveillance?				
	b.	or  i. Artificial or natural  barrier around facility?	<u> </u>	house property and the second	******	
	-	<pre>and ii. Controlled entry?</pre>	<u> </u>		<del></del>	
	C.	Danger sign(s) at entrance?	V	Alter Alley Professionery	<u></u>	
4.	0wr	ner or operator inspections: 265.15	·			
	ā.	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?				

				YES	NO	NI	Remarks	
	b.	hav	es the owner or operator re an inspection schedule the facility?		F-1/2			
	C.	the	so, does the schedule address inspection of the following ms:					
		į.	monitoring equipment?	<u> </u>			· ·	·
	ï	ij.	safety and emergency equipment?	<u>a</u>				·
	i	ii.	security devices?			77		
	i	Í۷۰	operating and structural equip- ment (i.e. dikes, pumps, etc.)?	· <u>-1/</u>				1
		V .	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?					
	V	/i.	inspection frequency (based upon the possible deterioration rate of the equipment)?	<u> </u>				
	ď.	Are ed	areas subject to spills inspect- daily when in use?	_ Barrelia	, j. j.			
		an '	s the owner or operator maintain inspection log or summary of er or operator inspections?					
	f.	Does fol	s the inspection log contain the lowing information:					
		i.	the date and time of the inspection?					
	į	i.	the name of the inspector?	/				
	ji	Ţ.,	a notation of the observations made?	<u> </u>				
	i	٧.	the date and nature of any repairs or remedial actions?	<u> </u>				
Do p	ersonn ude:		raining records 5.16					
	⊹a. «	Job	titles?			- Boom		
	b. ,	Job	descriptions?	✓.				

5.

			ILS NO	14 T	Remarks
	C *	Description of training?	<u> </u>		· · · · · · · · · · · · · · · · · · ·
	d.	Records of training?	<u> </u>		
	e,	Did facility personnel receive the required training by 5-19-81?	<u> </u>	· · · · · · · · · · · · · · · · · · ·	
	f.	Do new personnel receive required training within six months?	NA		no new personal
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?	<u> </u>	an and the same of	
Õ. ·	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1	7		•
	a.	Special handling?	<u> </u>		
	b.	No smoking signs?			
	C.	Separation and protection from ignition sources?	<u>·</u>		-

# Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

		·
٦	Maintenance and Operation of Facility: 265.31	VEC NO NT Describe
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	YES NO NI Remarks
2.	If required, does the facility have the following equipment: 265.32	
	a. Internal communications or alarm systems?	I Telephone
	b. Telephone or 2-way radios at the scene of operations?	<u> </u>
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	
	Indicate the volume of water and/or foam	mavailable for fire control:
	Hydront on street,	sprinkling also fite entiquished
	V	
3.	Testing and Maintenance of Emergency Equipment: 265.33	
	a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	
	b. Is emergency equipment maintained in operable condition?	
4.	Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	<u> </u>
5.	Is there adequate aisle space for unobstructed movement?	
6.	Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	<u> </u>

- Does the Contingency Plan contain the following information: 265.52
  - a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
  - b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
  - Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
  - d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
  - e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- 2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

<u> </u>	-
<del>\</del>	<del></del>

D-1

			YES NO	NI	Remarks	
٦.	Eme	rgency Coordinator 265.55				
	g∘	Is the facility Emergency Coordinator identified?	<u> </u>		· · · · · · · · · · · · · · · · · · ·	
	b.	Is coordinator familiar with all aspects of site operation and emergency procedures?	<u></u>			
	C.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	· <u>· · · · · · · · · · · · · · · · · · </u>	, , ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
4.	Eme	ergency Procedures 265.56				
	at Coc	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency occedures listed in 265.56?	K A		none has	eccurred

	YES	NO	NI	Remarks
Closure 265.112				
a. Is the facility closure plan available for inspection	?	***************************************	den comange (major) de	
b. Does the plan identify:				
i. maximum extent unclosed d ing facility life?	lur-			
<pre>ii. maximum hazardous waste i   ventory?</pre>	n-	Toronto and an in-		
iv. estimated year of closure	?	1		no auticipated date
v. schedule of closure activ	ities? 📈			of closure
c. Has closure begun?			· .	
Post-Closure 265.118				
a. Is the post-closure plan avai for inspection?	lable			
b. Does this plan contain:				
		·		
cover, or containmen	it			
ment				
of person or office to co	ontact	-	<del></del>	
c. Has the post-closure period b	egun?	<del></del>	·	
d. Is the written post-closure of estimate available? 265.144				
	a. Is the facility closure plan available for inspection b. Does the plan identify:  i. maximum extent unclosed of ing facility life?  ii. maximum hazardous waste inventory?  iv. estimated year of closure v. schedule of closure active.  c. Has closure begun?  Post-Closure 265.118  a. Is the post-closure plan avait for inspection?  b. Does this plan contain:  i. description of groundwate monitoring activities and frequencies?  ii. description of maintenance activities and frequencies?  ii. description of maintenance activities and frequencies for  AA. integrity of cap, fincover, or containment structures, where apacable  BB. facility monitoring ment  iii. name, address, and phone of person or office to conduring post-closure care  c. Has the post-closure period be d. Is the written post-closure care	a. Is the facility closure plan available for inspection?  b. Does the plan identify:  i. maximum extent unclosed during facility life?  ii. maximum hazardous waste inventory?  iv. estimated year of closure?  v. schedule of closure activities?  c. Has closure begun?  Post-Closure 265.118  a. Is the post-closure plan available for inspection?  b. Does this plan contain:  i. description of groundwater monitoring activities and frequencies?  ii. description of maintenance activities and frequencies for  AA. integrity of cap, final cover, or containment structures, where applicable  BB. facility monitoring equipment  iii. name, address, and phone number of person or office to contact during post-closure care period?  c. Has the post-closure period begun?  d. Is the written post-closure cost	a. Is the facility closure plan available for inspection?  b. Does the plan identify:  i. maximum extent unclosed during facility life?  ii. maximum hazardous waste inventory?  iv. estimated year of closure?  v. schedule of closure activities?  c. Has closure begun?  Post-Closure 265.118  a. Is the post-closure plan available for inspection?  b. Does this plan contain:  i. description of groundwater monitoring activities and frequencies?  ii. description of maintenance activities and frequencies for  AA. integrity of cap, final cover, or containment structures, where applicable  BB. facility monitoring equipment  iii. name, address, and phone number of person or office to contact during post-closure care period?  c. Has the post-closure period begun?  d. Is the written post-closure cost	a. Is the facility closure plan available for inspection?  b. Does the plan identify:  i. maximum extent unclosed during facility life?  ii. maximum hazardous waste inventory?  iv. estimated year of closure?  v. schedule of closure activities?  c. Has closure begun?  Post-Closure 265.113  a. Is the post-closure plan available for inspection?  b. Does this plan contain:  i. description of groundwater monitoring activities and frequencies?  ii. description of maintenance activities and frequencies for  AA. integrity of cap, final cover, or containment structures, where applicable  BB. facility monitoring equipment  iii. name, address, and phone number of person or office to contact during post-closure care period?  c. Has the post-closure period begun?  d. Is the written post-closure cost

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Section G - JSURE AND POST CLOSURE (Part 200 Subpart G)

### Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

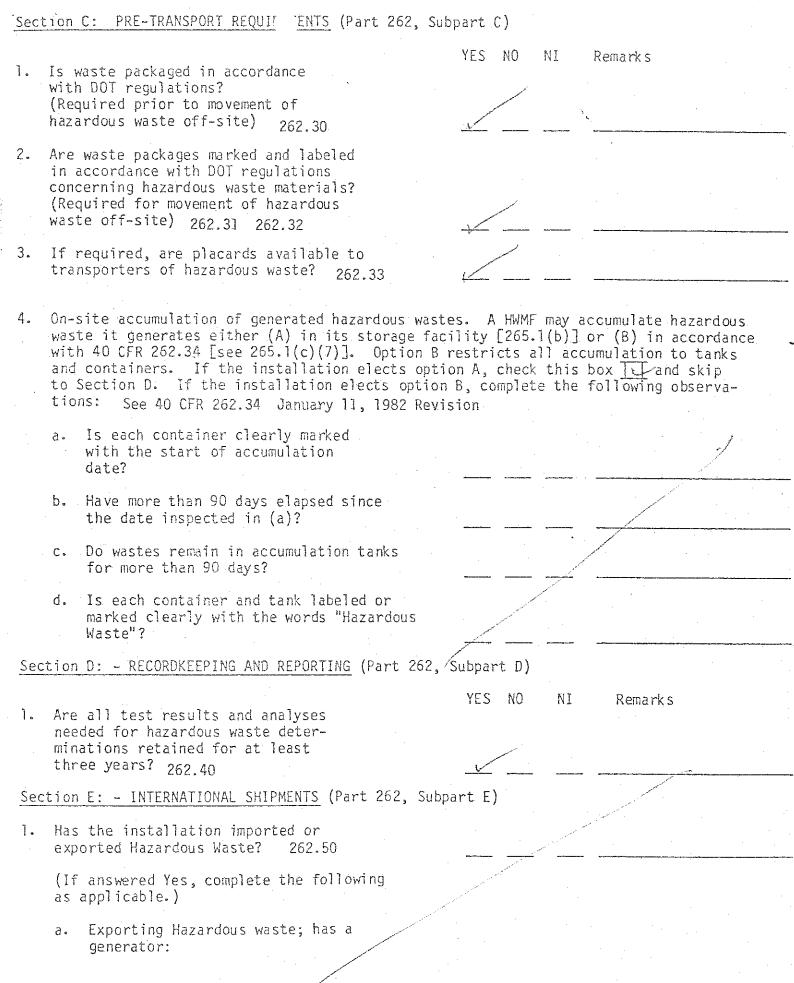
		YES NO	NI	Remarks
7.	Are containers in good condition? 265.171	<u> </u>	m. Wherever we received	
2.	Are containers compatible with waste in them? 265.172	<u> </u>	and the second s	
3.	Are containers managed to prevent leaks? 265.173		u <u> </u>	
4.	Are containers stored closed?	<u> </u>	· -	
5.	Are containers inspected weekly for leaks and defects.			
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.176		
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	WA	en e	
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	NA		

CCCCIDII (L. CCCC)	Sectio	n A:	Scope
--------------------	--------	------	-------

1.	Complete this Appendix if the owner or operator of a TSD facility also generates
	hazardous waste that is subsequently shipped off-site for treatment, storage,
	or disposal.

			YES	NO	NI	Remarks -
(1)		s the operator have copies of the manifest ilable for review? 262.40	<u> </u>		·	
(2)	mon	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.				
(3)	fol cop fes	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21			·	
	a.	Manifest document number?	2			
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	<u> </u>	/ 	· · · · · · · · · · · · · · · · · · ·	
	Ç.	Name and EPA ID Number of Transporter(s)?	<u> </u>	/ ·	·	
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u> </u>	/ 		
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	1			
	f.	The total quantity of waste(s) and the type and number of containers loaded?	<u>~</u>	/ 		
	g.	Required certification?				
-	h.	Required signatures?				
(4)	Rep	portable exceptions 262.42				

- a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.
- b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.



GN-2

# RCRA INSPECTION REPORT - INTERIM STATUS STATEMENT, STORAGE, AND DISTURAL FACILITIES: Form 1 - General Facility Standards 122.7(1) I. General Information: (265.74)

(7,)	Facility	Name	BASF	Wyandotte	Corp	oration						
(8)	Strcet:		1700	Blaney Dr	ive			-				
								<u>Oakland</u>				
5	•	2 2			*						9	;
(H)	Operator		BASF	Wyandotte	Corp	oration						
												-
(1)	City:		Troy.	e de la companya de l	_(K)	Sţate:	MI	is e	(L)	Zip	(ode:	48034
;f1)	Phone:	313-643-08	380		10	(N) Cou	nty:	Oakland				70
	. 200						R 121	3.40.		2		
9)	Owner:		BASF	Wyandotte	Corp	oration	10					
	, · ·											
								Wayne				
5 <b>.</b> 50												
		8 g 6						_ Municipal		X P	rivat	ž.
. 7)	Type of	Ownership:		S	tate			County				
(n')	Date of	Inspection	: _9/	17/81	_(Q)	lime of	Insm	ection (From)	10:15	A.M.	(īo) <u>1</u>	1:30 A
(1.)	seather	Conditions	: <u>C1</u>	oudy, temp	erat	ure abou	t 60°	F	NOS NOSAY O OR NOSA OROGINARANSQUIA.			
	A Control of the last of the l	· 20 · mags gar vivo carri si a como - nuins									# 44	9

122.4

			Yes	tio	Rot Inspecial	Sec Hord
)		the Regional Administrator notified regarding:				t .
	9 .	Receipt of hazardous wiste from a foreign source? 265.12(a)	Ço ağı mamasılında ayılın ay	<u> </u>	Whatever to be a sugar, as a	· ·
	2.		# Professional Communication	X ,	Office all the former time	What have a grown and a second
	Gen	eral Waste Arilysis:	•	•		
	4	Has the owner operator obtained a detailed chemical and		e		
		physical analysis of the waste? 205.13(a) or	X	Strateg grapes of problems and	Annual desirability of the state of the	Peri se a susual region un
	2.	Does the owner operator have a detailed waste analysis plan on file at the facility? 205.13(b)	X	The sq. ( provided and squares	· · · · · · · · · · · · · · · · · · ·	W yeld diagon spile o
	3.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of				·
		hazardous waste from off-site? 205.13(c)	_N/A	e ege e passage		111 in makemananan ye
	Sec	urity - Do security measures include. 265.14			•	-
	1.	24-Hour Surveillance? 265.14(b)1 - 07-	State		الراج المعتقدة	
	2.	Artificial or Natural Perries Around Facility? 2(5.14(b)2	_X (Fence)		The state of the s	
	3.	Controlled Entry? 265.14(b)211-0-	Approximation of the state of t			and the second second second second second
		Danger Sign(s) at Entrance? 265.14(c)				
	Do ( Inc	Owner Operator Inspections Lude: 205.15	,			
		Records of Malfunctions? 263.15(a)1.	X	Mr Sign on Language agreements record		÷
	2.	Records of Operator Error?	<u> </u>		,	
	3.	265.15(a)1 Records of Discharges?	X			geographic granic (
	4.	255.15(a)1 Inspection Schedule?	X			
	5.	265.15(a)4 Safety, Emergency Equipment?	X			
	6.	Tuf.15(b)1 Saturity Devices?	X			# JA 100 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	7.	26.15(b)] Operating and	W. STERRAGE SE		· · · · · · · · · · · · · · · · · · ·	
	i.	Structural Devices? 265.16(b)1	X	-	· · · · · · · · · · · · · · · · · ·	
	ê.	Inspection (cg?) 365.15(d)	X			<del>-</del> :

		Yes	No	Not Inspected	Wholey in
(ε) <u>.</u>	Do Personnel Training Records Include: 265.16(d) 1. Job Titles? a steer of the	X	**************************************		
	2. Description of Training?	<u> </u>			A. J. Labora
ŧ	3. Records of Training?	X		Sentille and the sent sent sent sent sent sent sent sen	TO THE WORLD AND THE REAL PROPERTY OF THE PROP
	Is Personnel Training Completed within the Required Time Frame?		Annual State of the State of th	Management - Adams on the co.	
(F)	Are the Following Special Requirements for Ignitable, Restrive, or Incompatible Was es Addressed? 265.17				
	1. Special Handling?	6————————————————————————————————————	N/A_		#2 No.Smokine
	2. No Smoking Signs?	X	Aller Talle & Allergon, visite		in Plant
• .	3. Separation and Confinement?		N/A		
(A)	IV. PREPAREDN Maintenance and Operation of Facility:	ESS AND	PREVENTION - 265	Subpart C	
(B)	1. Is there any evidence of fire Explosion, or release of hazardous waste or hazardous waste constituent?  265.31  Does the Facility have the Following Equipment: 265.32	•	- X		
	<ol> <li>Alama System?</li> <li>265.32(a)</li> </ol>		X	-	#3
	<ol> <li>Telaphone or 2-Way Radios? 265.32(b)</li> <li>Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?</li> </ol>	X			
	265.32(c) Indicate the volume of water and, 265.32(d) Units: 30 (various types) - also		•	fire control	**************************************
٠	Hydrant on street near bu		ers and afailits.		the second secon
	Committee of the second		The second secon	the an and community and an arrangement of the community	. The second of

	•	Yes	Ħ o	Not Inspectuals	See Persa Number
(;)	Testing and Maintenance of Emergency Equipment: .265.23 Recordkeeping required 1. Has the Owner or Operator	under 265.15(b)1			
	<pre>established Testing and Maintenance Procedures  for Emergency Equipment?</pre>	X	. Marke war warden werkennerstaan		
	2. 's Emergency Equipment Haintainer in Operable Conditions?	X			
.j)	Has Owner Operator Provided Immediate Access to Internal Alarms (if needed)? 265.34	Mary new processor development of the second	X	· ·	#4
(C)	Is there Adequate Aitle Space for Unobstructed Noverint? 265.35	X	American version		
<b>(i)</b>	Are Arrangements with Local Authorities Included in the Operating Record? 265.37	<u>X</u>			
(A)	V. CONTINGED  Does the Contingency Plan	NCY PLAN AND EMERGEN	ICY FPOCEDURES	. 265 Subpart	D
	1. The actions facility personnest take to comply with §254.51 and 265.56 in resto fires, explosions, or unplanned release of hazawaste? (If the owner has Prevention, Control, and measures (SPCC) Plan, he only to amend that plan to incorporate hazardous was management provisions that sufficient to comply with requirements of this Part	ponse any rdous a Spill Counter- needs o te t are the			
	Arrangements agreed to by police departments, fine hospitals, contractors, a and local emergency respo to coordinate emergency s	departments of nd State nse teams ervices	· . •		
	pursuant to §258.37?	X	p garage a sec o	· · · · · · · · · · · · · · · · · · ·	#5

, ,						
		•	Yes .	Ho	Not Inspected	See Rom Number
	;	3. Names, addresses, and phone				
		numbers (office and home) of all				į.
		persons qualified to act as emergency coordinators?	Y		•	İ
		265.52(d)	A		· management of the second of	*
		4. A list of the emergency equipment				
		at the facility which includes the				-
		location and physical description				Two Ludod
		of each item on the list and a	χ	٠	ς	Included atety Check
		<pre>brief outline of its capabilities? 265.52(e)</pre>	^		The second secon	List
		<ol> <li>An evacuation plan for facility</li> </ol>				
		personnel where there is a possibil			•	
		that evacuation could be necessary!				1
		(This plan must describe signal(s)	•	•		
		<pre>do be used to begin evacuation, evacuation routes, and alternate</pre>				
		evacuation routes:)	Х		•	
		265.52(f)	E-00000000 0000 Arri W 1000		The second distriction of the second	
	11	· · · · · · · · · · · · · · · · · · ·	•		•	•
. (		Are copies of Contingency Plan Available at Site and local Emengency				
		Organizations?		X		#6
		265.53	• •	*		<del></del>
	0}	Emergency Coordinator				
		265.55	•			
		1. Is the facility Emergency Coordinator identified?	٧		e t	
		conditiator (dentitied)	<u> </u>	•	Control China and American	######################################
		2. Is Coordinator Familiar with			•	
		all aspects of site operation				
		and emergency procedures?	<u> </u>			Community of the sand Community of the control by the
		3. Does the Emergency Coordinator				
		have the authority to carry				
		out the Contingency Flam?	<u> </u>	a management of the last of th	manage comments of the second	· · · <u></u>
;	9)	Emengency Procedures		• •		
	•	•		ħ) /	'A – No emergen	eries
		If on Emergency Situation has occurred			nce RCRA took	16163
		at this facility; has the Emergency Coundinator followed the Emergency			effect	
		procedures listed in 256.56?			· ,	
		*	and the second second		**************************************	L'ELEMENT CO
			•	•		
4						

, <b>4</b>	VI . "MIFEST SYSTEM RECC	RIMFEP I	Ciù.	1 REP		26 s i surtipa	rt E
		Yes	ĺ	10	. Hot Insp	e 1 4	Ser Re Number
(A)	Use of Manifest Systim						
	1. Does the facility follow the procedures listed in §265.71 for processing each Hamifest?	X	· .		** * · · · · · · · · · · · · · · · · ·	· <del>··</del> · · · ·	
	<pre>2. Are records of past shipments   retained for 3 years?   265.71(5)</pre>	<u> </u>					Kept Indefini
	Does the owner or operator meet requirements regarding Manifest Discrepancies? 265.72	X	-				#7-Compu Tracking System
(C)	Operating Record		_				oy a çen:
	Does the facility mail ain an operating record at the site as required in §265.73?	X					·
(0)	Availability, Retention and Disposition of Records					· .	
	Are all records available at the site for inspection as required in §265.74?	<u> </u>	•	·	**************************************	•	· · · · · · · · · · · · · · · · · · ·
	VII . CLOSUME A	MD POSI	G 051	IBE + ,2	<sup>(65</sup> Տա <b>հ</b> քշ	nt cand	Н
	Closure and Post Closure						
	1. Closure Plan Available for Inspection by May 19, 1981?			X		would	Closure involve removing
•	265.112(a) 2. Has this plan been submitted to the Regional Administrator? 265.112(c)	والمراجعة المتعادمة		<u> </u>	1	· ·	drums
	3. Has Closure begun? 265.112(c)		-	<u> </u>	<del></del>		Market and the Marketing agree of the con-
	4. Is closure cost estimate available by May 19, 1981? 265.142	************		<u> </u>			- Cost of ing drums
(B)	Post Closure Care and Use of Property - Has the Owner Operator supplied a Post Closure Monitoring Flan						
	(b) Pay 19, (1981)?	A STANK SALA CA	-	N/A		· ·	#10

265.117

MID 057007478 FFX IM WHATE TIME 252, 12

# RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS Form 2 - Generator Inspection 262 1. General Information:

(A)	Installat	ion Name:	BASF Wya	ndott	e Corpora	tion		
(B)	Street:	1700	Blaney Dr	ive				Only operation was the control of th
(C)	City:	Troy		_(D)	State:	MI		(E) Zip. Code: 4808
(F)	Phone:	313-643-0880			_(G) Co	unty:	Oakland	
			٠					•
<u>.</u> Η)	Operator:	BASF	Wyandotte	Corp	oration		entermination and the contract and the c	Michael Market and Commission of Commission
(1)	!treet: _	1700	) Blaney Dr	ive			and a second	e companya de catale de l'elle de la catale d
								(1) 71p Code: 48084
( 10	Fhone:	313-643-0880	)		_(N) Cou	ety: _	0ak1and	
( <b>C</b> )	umner:	BASF	Wyandotte	Corp	oration			
	· ·	1609						
						ΜI		(5) Zip Code: 48192
			p. <b>1</b> 112-111-111	Feder	al	-	_ Municipal	<u>X</u> Private
(V)	Type of C	wnership:						
(8)	fate <b>of ]</b>	nspection:	9/17/81	<del></del>	Time of	Inspe	ection (From	) <u>10:15 A.M.</u> ([c)]11:30
(X)	Meather (	onditions:	Cloudy	temp	erature	about	60°F	

Person(s) Interviewed	T i '	* 3		िशिश
	at append	allegide suppose to a second section of contract are a	eriodos do entre e	
	gangan akan		allering and an array of the second s	g. p
Inspection Participants	Tit	le	*	Telepi
		. 4		
			akar malikratakan dapatahan gebiannya dana dan dan yangan gamayah	
			· · · · · · · · · · · · · · · · · · ·	Di ambien verge pay
		. •		
•	•			
1 OTHER TYPE	OF HA	ZARDOUS WAS	IE VCLINITA	
Transporter (Form 3)		(B)	Chemical, Biologica	Physical Il Treatme
			•	
) Storage (Form 5)		(D)	Landfill	(Form 6)
		•		
)Incineration (Form 7)		•	Landfill Thermal I	
)Incineration (Form 7)		•		
Storage (Form 5)  Incineration (Form 7)  Comments:		•		

MARIFEST
----------

	<u>.</u>	. MANIFEST		
, -		Yes	flo	Not Inspe
•	Are copies of the Manifest available? 202.23(a)3 Does the Manifest contain the following information:	·	<del> degree de la constante</del>	
	<ol> <li>Manifest i rument number? 262.21(a)1</li> <li>Nume, mailing address, telephone number, and EPA ID Number of Generator? 262.21(a)2</li> </ol>	<u>X</u>		
	<ul> <li>Name and EPA ID Number of Transporter(s)?</li> <li>262.21(a)3</li> <li>Name, Address, and EPA ID Number of Designated permitted facility and alternate facility?</li> </ul>	Geregonium All mir vo	X	
; <b>-</b>	262.21(a)4 5. The description of the waste(s) (DOT shipping name, DOT hazard of DOT identification number)? 262.21(a)5 DOT information in CFR 6. The total quantity of waste(s) ar the type and number of containers loaded? 262.21(a)6	X 49 1 <u>72.101,</u> 1	72.202 and	172.20
·:.	<ol> <li>Required Certification? 262.21(b)</li> <li>Required Signatures? 262.23(a)1</li> </ol>	X	de algogia per amende com deservam e - algogia de de estre de algogia de alg	
(C)	Does the Owner or Operator Submit Exception Reports when Needed? 262.42	X RSPORT REQUIRE	EFNIS - 26	2 Tulina
	IV. PRC-INA	NEW ORL REQUIRE	TILINIS TIES	a . uupa
,	Is Generator Packaging waste in ancordance with DOT Regulations? 250.30 49 CFR Parts 173.178 and 179 A & waste packages marked and labele	<u> </u>		an englay gamagan k
·	In accordance with DOT Regulations concerning hazardous waste materials 162.31 49 CFR Part 172			
. •	l If required, are placands available to transporter? 202.33 49 CFR Part 172 Subpart F	X	de de la companya de	

ŧ

(3) Pre-shipment Accumulation:

Are containers marked with start of accumulation date? 252.34(a)

Are the containers of hazardous 2. waste removed from installation before they can accumulate for

more than 90 days?

Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?

4. Are wastes stored in tanks managed according to the following:

a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank? 265.192(b)

b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? · 265.192(c) c. Do continuous feed systems have

a waste-feed cutoff? 265.192(d) d. Are required daily and weekly inspections done? 265.194

e. Are reactive & ignitable wastes in tanks protected or rendered nonreactive or non-ignitable? (If waste is rendered non-reactive or nonignitable, see treatment requirements? 265.198, 255.17

f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR \$255.17(b)

 $1 \epsilon_{
m cut}/2$ 

Condition? 265.33

Latin i the hill millering

4. Has Owner/Operator Provided - Immediate Access to Internal Alarms (if needed)? 265.34(a) 5. Is there adequate Aisle Space for unobstructed Movement? 265.35 6. Are arrangements with local authorities included in the		•		
<ul> <li>5. Is there adequate Aisle Space</li> <li>for unobstructed Movement?</li> <li>265.35</li> <li>6. Are arrangements with local</li> </ul>	A		-	
6. Are arrangements with local				
operating .ccord?			. ^	
(C) Contingency Plan and Emergency Procedure				
1. Does the contingency plan contain the following:				* ·
a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)		Make in . W Augus y		
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?				
c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator. 265.52(d)  d. A list of all energency equipment at the facility which include the location and physical description of each item on the list, and a brief outling of its capabilities?			•	
265.52(e)  e. An evacuation plan for facility personnel where there is a cossibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.				

		Yes	<u> </u>	Not Inspected	See Ro Number
2.	Are copies of the Contingency Plan available at site and local Emergency Organizations? 265.53	(Seeignagification contents of our date	Magnatic are at reason and		Simple with a second second
3.			. ,		ì
•	a. Is the Facility Emergency Coordinator Identified?	· ·		to describe the second of the second	
	b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?		e e e e e e e e e e e e e e e e e e e	et Terres de la composition de la composit	
	c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	C	Constant and the second	The second second control of the con	******
1 s	Emergency Procedures -				٠
	If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in	:			
•	\$256.56?				
E R	ve Manifests, Annual Reports, exception Reports, and All Test esults and Analyses Retained for t least three years?	XCORDKEEP II	<u>1G</u>		
	V1/. INTERNA	JIONAL SHI	PMENTS		
ŗ	es the Installation Imported or xported Hazardous Waste? 202.50		<b>X</b>	·	•••• · · · · · · · · · · · · · · · · ·
	(If A was answared Yes, then comp	lete one o	or both of t	he following)	
	Exporting Hazardous waste, has a generator:				•
	a. Notified the Administrator in writing? 262.50(b)1 b. Obtained the Signature of the		otropi dike dara serasa sa		Annahidebak ala e e
,	b. Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? 262.EU(b)2		··· · · · · · · · · · · · · · · · · ·		

* ,	jn br ø				require	ment?	5?	·		,			w-2-	
(			.50(b)											ì
2. ,	has	the 262	gener.50(d)		Maste, require	ment:	s? _			,				Riago, realization of the second
•									-		•			
		•			ΛĪ	14 1	PREPAREI	R INFOR	HATION					
Tame:	, <del>(111-111-11-11-11-11-11-11-11-1-1-1-1-1</del>		<del></del>				<del></del>					ofreezen www.u	· · · · · · · · · · · · · · · · · · ·	•
itle:	e	•	<del></del>		•	**************************************	<del>1 </del>					- 1800-1800-1800-1800-1800-1800-1800-180		
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EMARK	<u>ئ</u> : _	***			· .							*****		is a will be applicated by the party
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	· - 1	***********		`		<del></del>							- '	
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Yes

-....

No

Not Inspected See hame. Humber

### RCR\* INSPECTION REPORT: - INTERIM STATUS SIMMOREDS Form 3 - Transporter Inspection (263)

#### 1. General Information:

3) Street:		Is) The Code.
c) City:	(D) State:	(E) Zip Code:
) Phone:	(G) County:	
•		
H) Operator:		
1) Street:	•	
I) City:	(K) State:	(i) Zip Code: _
⊭) Phone:	(N) County:	
Company of the Compan		
B1 De agre		•
		•
	(R) State:	
W) Coty:	(N) Scarce	·
Y) Chone:	(U) County:	
	[Federal Municipal	irivate
(V) Type of Ownership:	StateCounty	· ·
(W) Date of Inspection:	Time of Inspection (From	(To)
<pre>(X) Weather Conditions:</pre>		

. 4

) Per	son(s) Interviewed		Title-	leli	ephore -	
gas. vil Wresto \$ Upps.aps my debt					6	ì
	Alle Danie in instant	<del>ne at l'ania</del>	Title	Tel	ephone	-
2) Ins	spection Participants	·				ļ 
الحب مو <u>س</u>				an conductive and the conductive	and the state of t	njykasion sije
E4-11-4		بالمسرومين.	gangingsing all mightings gands steps and a second of minority for distriction as			
		•	e e			•
•	11. OTHER	TYPE OF	HAZARDOUS WASTE A	CTIVITY		; :
	•					
(A)	Generator (Form 2)		(B)	Chemical, Physi Biological frea	cal and trent (For	ាធ - 4
(c) _	Storage (Form 5) .		(D)	Landfill (forw	6.)	
(E)	Incineration (Form 7)		(F)	Thermal Incates	ent (Form	7)
(6.)	Comments:			- Allegador - Company - Co		
(6)				ngina Maranghangkan palaganikan palaganikan dinakan dinakan dinakan dinakan dinakan dinakan dinakan dinakan di		_
•				and the same of th	· ·	.
				The state of the s		
	Supplemental forms (Listed in inspected. Attach all Supplemental Suppl	Parath mental	esis) must be com forms to this rep	pleted for each ort.	activity	-
• •		111.	RECORDKEEPING			
		Yes	No	Not Inspected	Sea Rema Number	ark.
(t.)	Are Copies of the Completed tanifest(s) or Shipping Paper Available for Review and Ratained for Three Years?  263.22(a)	(s)	and the second s			

			Yes	<b>N</b>	Hat Inspecte	d Rushe
<i>f</i> !	Does the Transporter Record on	the			· · · · · · · · · · · · · · · · · · ·	and the second s
i	Does the Transporter Adda de Name Per Manifest the Date the Waste let 263.20(f)1 Are Completed Manifest(s) on F	A44-2				t terresis established
F	3 SIGNED					!
	263.22(a) and 263.20(f)2	V. MISCE	LLAREOUS			
	**			,		•
	Does Transporter Transport Hazardous Waste Into the					
t:	U.S. from Abroad? 263.10(c)1 Does the Transporter Mix				• • • • • • • • • • • • • • • • • • •	- <del></del>
2.4	Hazardous Waste of J. Terent DOT Shipping Descriptions by Placing them into a Single	•				•
	Container?  263.10(c)2  E: If (A) or (B) were answere				or the second se	
	E: If (A) or (B) were answere Must comply with the Gener 263.10(c) V1	•	R THEORMAI	101		
	\$ 3 kg 3 1	and the second s	an description of the second o	الماسون والمناسون والمناسون والمناسون		
	Title:					
•	Phone No.:	and the second s	•	. <b>V</b> .		
Re	marl St					
	· ·					

17) BILLIAN INC.

### RCRA INSPECTION REPORT - INTERIN STATES STANDARDS TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form 4 - Chemical, Physical and Biological Treatment/Land fre tment 265 - Subpart ()

#### 1. General Information

Faci	lity Name:	· .	<del></del>	and the second s	
Stre	21:				W-territoria del legi legi legi i su sergita <u>li i seritoria della </u>
City	: (D) State:			(E) Zib Cod	de
Phon	e: (G)	County	4 ·	No de November - and All All All All All All All All All Al	
	•			•	
æ		cal, Phy ment (Su 265		and Biological	
		Yes	D S S S S S S S S S S S S S S S S S S S	Not Inspected	See Remark Number
1.	To equipment used to treat only those wastes which will not cause leakage, corresion, or premature failure? 255.401(b)		· · ·		
2.	is a continuously fed system could be system could be system as system system of hazardous wiste inflow stoppage or control (4.9., cut-off system)? 265.401(c)		entre of the country opposite and also desired and also d		
3.	Tes the owner or operator addressed the waste analysis requirements of 205.4027 and 265.13				
4.	Fre inspection procedures followed according to <u>265.403?</u>		receipting a state of the state		
ź,	The the special requirements fulfilled for ignitable or reactive wastes?				
5-	Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406				

100 O 400 O 400 O 400		Yes	Ro	Not Inspected	See Benark Number
].	Is hazardous waste capable of biological or chemical degradation? 265.272(a)		-		
2.	Are run-of and run-on diverted from the facility or collected (Effective date: November 19, 1981)? 265.272(b&c)				
3.	Is waste analysis according to 265.273?		1		
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 205.2767	and state of the s			
5.	Is an unsaturated zone monitoring plandesigned and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278(a)	Communication of Communication and Communication of Commu	A section of the sect		
6.	Dies the unsaturated zone monitoring plan address the minimum information specified in 265.278(b and c)?	A			
	Are records kept regarding application dates and rates, quantities, and location of all hazardous waste placed in the facility? 265.279	i on			
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? 265.281				
9.	Are incompatible wastes land treateu? (If yes, 235.17(b) applies.) 265.282			and the state of t	

## RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS 265 - Subparts I.J.K. and L I. General Information

Facility Name: BASF Wyandotte				and the second s
street: 1700 Blaney	<del>-</del>	<del> </del>		
city: Troy (D) State: MI	<del></del>	(E)	ZIP Code	48084
Date of Inspection: 9/17/81		•		
. II. Storage Facility Standard	· (Par	t 265	Piliper - v v. av	
Facilities which store containers of hazardous waste (Sub)	part I	) 26!	<u>.</u>	*
	YES	110	NOT IN- CEECCED	REMARA
are containers in good condition? 265.171	X	-		
Are containers compatible with waste in them? 269.172	Χ		- nan wiki sawas n	· · · · · · · · · · · · · · · · · · ·
Are containers stored closed? 265.1/3(a)	X			#13
Are containers managed to prevent leaks? 265.1/3(b)	X			
The containers inspected weekly for leaks and defects? Great 1807 179 265.174	X			
Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	N/A			#12
Are incompatible wastes stored in scparate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	N/A 17(a)			
Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance? 265.177(c)	N/A	—		
Figural Lies which store hazardous waste in tanks (Subpart	J)·	<b>.</b>		
Are tanks used to stone only those wastes which will not cause corresion, leakage or premature fallowers tanks (65.192(6))	N/A	April 1 and		
2. E. proovered tanks have at least (0 cm (2 feet) of freetoand, or diluter of other containment containment (65.19%).			The state of the s	
Continued on to a page				Thu, I

		.,	SHICTEL		
To continuous feed systems have a waste-feed cutoff?	265.1	2 (d)			
Are waste analyses done before the tanks are used to store a substantially different waste than before?	265.1	3(n)			
Tre required daily and weekly inspections done? 265.19/					and the second s
Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.198	The state of the s				
Fre incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) 26	199				
ncilities which store hazardous waste in surface impoun	ndment	s (Su	bpart K)	265	
Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222					
Do earthen dikes have protective cover? 265.223					The second secon
Are waste analyses done when the impoundment is used to store a substantially different waste than before	265	. 225 (.	(1)		
Is the freeboard level inspected at least daily? 265	, 236 (a	)1			, while we a maker from a minimizer managing system survey.
Are the dikes inspected weekly for evidence of leaks or deterioration? 265.226(a)2					
Are reactive & ignitable wastes rendered non-reactive or con-ignitable before storage in a surface impound ment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.299(a)1	e				
Are incompatible wastes stored in different impound- ments: (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230	- copposition				
cilities which store hazardous waste in waste piles	(Sub)	oart L	.) 265		
Fre waste piles covered or protected from the wind?					
Is each in-coming movement of waste analyzed before teing added to the waste pile? 265.252	-			ه بعد د د <u>د دست</u>	
Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981)	265.	5.1	··	مَفُّ دِهَا مَا رَبِيمِينَ	
Are reactive & ignitable wastes rendered non- reactive or non-ignitable before storage in a pile (1) waste is rendered had-reactive or non-ignitable are breatment requirement.) 265.250(a) (	?			a. 4	

	· <del>-</del>	The state of the s		FECTES	f
	Grapiles of reactive or ignitable waste protected?				
	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply,) $265$	.257()			and the same of th
7.	Ar. piles of incompatible waste protected by barriers or listance from other waste? 265,257(b)		, <u>-</u>		and the state of t

### RCRA INSPECTION REPORT - INTERIM STATUS STATUARDS FORM 6 - LANDFILL INSPECTIONS

265 - Subpart N

#### 1. General Information

(A) Fac	ility Name:	· · · · · · · · · · · · · · · · · · ·	yali ada pinagaya yalan manaya ka malaba a ayan m				
(B) Str	cet:	and the suite of t	·	No <del>vez-manak</del> up <del>in-man</del> a-	· · · · · · · · · · · · · · · · · · ·	·	
(C) Cit	y • .	(D) Sta	ate:	·	(E) Zip Cod	de 💹	
(F) Dat	e of Inspection:	ione (III) This will be in the complete wave de the submidiscent					
.•	II. Landf	ills	Yes	No	Not Inspected	See Num	
	neral Operating Requirements - es the facility provide the fol	lowing:					
*1.	Diversion of run-on away from portions of the fill? 265.30	active 2(a)	ation side dates about the .			Terrender (1)	
*2	Collection of run-off from ac portions of the fill? 265.30		·		· · · · · · · · · · · · · · · · · · ·	. •	
*3. 4.	Is collected run-off treated 265.30 Control of wind disposal of h waste? 265.30	2(b) azardous		# 15 The state of		a	
<b>(*</b> E	Iffective 11-19-81)						
	rveying and Recordkeeping - es the Operating Record Include			·			
1.	A map showing the exact locat and dimensions of each cell? 265.309(a)			·	<u> </u>	<del></del>	
2.	The contents of each coll and location of each hazardous wa type within each cell?  265.309(b)				4 - W. J.		

		the state of the s	•	
С.	Clo	sure and Post-Closure		
	8	Is the Closure Plan available for inspection by 5-19-31? - 265.112(a)	And the second s	<del></del>
	2.	Has this plan been submitted to the Regional Administrator? - 265.112(c)		∕Schweit Masser*
	3.	Has Closure begun? -	Annual Company of the	
	4.	Is Closure cost estimate available by 5-19-81? - 265.142(a)		. 14 6
D	F	pecial requirements for ignitable or eactive waste		
	e	re ignitable or reactive wastes treated to the resulting mixture is no longer ignitable or reactive? 265.312		Constant of
		(If waste is rendered non-reactive or non-ignitable see treatment requirements)		
·		If not, the provisions of 40 CFR <u>265.17(h)</u> apply.		<b>4,50</b> 4
	E.	Special requirements for Incompatible Wastes.		
	•	Does the owner or operator dispose of incompatible wastes in separate cells?	The state of the s	
		265.313 If not, the provisions of 40 CFR $265.17(b)$ apply.	Constitution Committee to the Constitution of	Evido
-		Special Requirements for liquid waste (effective 11-19-81)		
		<ol> <li>Are bulk or non-containerized liquids placed in the landfill?         265.314(a)</li> <li>Does the landfill have a chemically and physically resistant liner system</li> </ol>	?	i ac
		265.314(a)1		

•	Yes	No	Not Inspected	See R. Numbe
3. Does the landfill have a functional leachate collection system? 265.314(a)?	Plaked 498 See 1289	ala a san siyayeyi waxa aday sankar	Arthur ( A. S. 1970 - No. In Assessive Tiple and Michigan	
4. Are free liquids stabilized prior to or immediately after placement in the landfill? 265,314(a)2	designation of residences			Ball State Language Language
Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the lanafill?  265.315(a)	dender-represent rese		Section Assessment of the Contract Assessment of	***************************************

G.

# PCRA INSPICTION REPORT INTERPRETATION CARD MADE SUPPLEMENTAL FORM FOR THERMAL TREATMENT (AND HOURSELDERS) 265 - Subparts P and 0 I. General Information

Facility Name:					and department of the property of the contract
Street:	(D) Stati				
City	(1)	-			0-1000
Pate of Inspection:					
. •	II. Petermina	tion of St	cady Sta	t e	·
	4			•	
. Type of unit (i.e., type of	incinerator or			) :	
. Components and steady state	condition:				
	疫性质症	Was this	component	at SS prior	to adding was
Component		. Ye	s No	Not Inspectrd	See Remark
				•	
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2. Documented, written data may be substituted for analysis for these. Are either present for:	) es	Но	Not Inspected	Ecs function:
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#### Comments:

- 1. No written descriptions of training required for each position exist, but all employees receive certificates for completion of training, and all records of training information and memos regarding training are kept on file.
- 2. Company feels they comply because they store waste TDI in a confined area. At some points during interview they stated that TDI was reactive, yet at other times they stated their wastes were not ignitable, toxic or reactive, just corrosive. Company stated that if they handle additional wastes in the future that are reactive, ignitable or toxic, their plans will be amended and updated to comply with RCRA requirements.
- 3. Telephone system could be used as alarm system. (Internal Communication System).
- 4. There are no alarms near the area where TDI is stored, but there are numerous access points to alarms within building (it telephones constitute alarm system).
- 5. Contingency plan includes police and fire department phone numbers plus phone number of national response center. No written arrangements with local emergency authorities included.
- 6. Plan is available on site but not at police, fire department, hospitals, etc. The company agreed to send a copy to the police and fire department immediately.
- 7. The company utilizes a computer tracking system to detect any problems regarding manifests.
- 8. No written closure plan. Company felt it was unnecessary since upon closure they would simply remove whatever drums were on site.
- 9. Company feels they can estimate closure costs at any time by calculating the costs required to remove accumulated drums of TDI. Thus, they feel they meet the requirement of 265.142. There was no written estimate presented to us.
- 10. No plan presented. Company feels the requirement does not apply to this plant.
- 11. No alternate facility listed because no space provided on form for that purpose. The primary disposal facility is designated and necessary information for that facility is listed.
- 12. Containers are inspected at least weekly, but company claims it is not feasible to store wastes 15 meters from property line due to site layout. At this point the company stated their TDI waste is not ignitable or reactive, only corrosive. Containers are stored in a diked area.

It appears that drums could be stored 15 meters from property line - the site is physically large enough. Unknown why company stores them near property line.

13. Some containers, though closed, had vent pipes installed to allow for relief of pressures that build up when drum contents are heated by air or sunlight.

TALLANDALATION  JITALLANALATION  JITALLANALATION  JITALLANALATION  LUCATION  LUCATION  LUCATION  LUCATION	throe it and supply the correct information in the appropriate section below, if the fable is complete and correct, leave Itimo I, ii, and III below black. If you did not receive a purported tabet, complete all items, "Installation" means a single site where hazardous waste is generated, treated, stored another disposed of, or a transporter's principal place of business, Plaste refer to the INSTRUCTIONS FOR FILLING NOTIFICATION before completing this form. The information requested herein is remained by law (Section 3010 of the Resource Conservation and Brecovery Act).
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V CERTIFICATION
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obsaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting faise information, including the possibility of fine and imprisonment.
SIGNATURE NAME & OFFICIAL TITLE (type or print) DATE SIGNED
Rudy Merriweather 8-7-80  Works Manager

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I if the supplemental form is attached	i. If you answer "no"	to each qu	uestion, y	ou need not submit any of the	se forms. You may answer "no	" if your activity
is excluded from permit requirement	ts; see Section C of the	instruction	ns. See als	o, Section D of the instructions	s for definitions of bold—feeed	terms.
SPECIFIC QUESTIC	Mark Committee Commit	MAR	K 'X'		حوال الله عائد المشكل الله الله الله الله الله الله الله ال	MARK'X'
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īV	DESCRIPTION	OF	HAZA	RDOUS	WASTES

- EPA HAZARDOUS WASTE NUMBER -- Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate ENCLICUANT OF ME ACUSE codes are:

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If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

1. PROCESS CODES:

#### D. PROCESSES

- - For listed hazardous waste: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
  - For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code/s/ from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

    Note: Four spaces are provided for entering process codes, if more are needed: (1) Enter the first three as described above; (2) Enter "000" in the
  - extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).
- 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Selections of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B.C. and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

  2. 4n column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column O(2) on that line enter
- "included with above" and make no other entries on that line.

  3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous weste.

EXAMPLE FOR COMPLETING ITEM TV Ishown in line numbers X-1, X-2, X-3, and X-4 below! - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated. 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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V. FACILITY DRAWING  All existing facilities must include in the space provided on	page 5 a scale drawing of the facility (see instructi	ons for more detail). F/.:	A/55
VI. PHOTOGRAPHS			
All existing facilities must include photographs (aeri	ial or ground—level) that clearly delineate al	l existing structures; existing	storage, A
treatment and disposal areas; and sites of future stor	rage, treatment or disposal areas (see instruc	tions for more detail).	F6 56
VII. FACILITY GEOGRAPHIC LOCATION			
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VIII. FACILITY OWNER			Ş⊈ ((eKinākolī <b>ķ</b>
	listed in Section VIII on Form 1, "General Inform	ation", place an "X" in the box	to the left and
skip to Section IX below.			
B. If the facility owner is not the facility operator as I	isted in Section VIII on Lorm 1, complete the ro	llowing items:	n de la Salanda (1965). De la Salanda (1965).
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3. STREET OR P.O. BOX	4. CITY OR TOWN		ZIP CODE
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IX. OWNER CERTIFICATION	the state of the s		
I certify under penalty of law that I have personally documents, and that based on my inquiry of those in	individuals immediately responsible for obta	ining the intormation, i Delie	ve mat me
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including the possibility of fine and imprisonment.			
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED	/>
A.E. Dunn, Secretary	156	11/19	1/20.
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X, OPERATOR CERTIFICATION		ntion cultraited in this and a	l attached
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R.E. Dunn, Secretary  EPA Form 3510-3 (6-80)	De dum	1/17	H NTINUE ON PAGE 5